

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 CASE NO. 1:20-cv-05232-JPB
5 1:20-cv-05231-JPB
6 1:20-cv-05233-SEG

7 G.W., J.G. and A.G.,

8 Plaintiffs,
9 vs.

10 NORTHBROOK INDUSTRIES, INC. d/b/a UNITED INN AND
11 SUITES,

12 Defendant.

13 _____ /

14 ZOOM VIDEO-RECORDED DEPOSITION OF
15 KARIM VELLANI

16 Tuesday, November 28th, 2023
17 9:32 a.m. - 4:07 p.m.

18
19
20 Stenographically Reported By:
21 Edward F. Kidd
22 Registered Professional Reporter
23
24
25

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 2.5

	Page 2		Page 4
1	APPEARANCES:		1 The following proceedings began at 9:32 a.m.:
2	(All appearances remotely via Zoom)		2 THE VIDEOGRAPHER: This is the beginning
3	On behalf of Plaintiffs:		3 of the deposition of Karim Vellani in the
4	5 FINCH McCRAINE, LLP		4 matter of G.W. versus Northbrook Industries,
5	229 Peachtree Street Northeast		5 Inc., et al. Today's date is November 28th,
6	Suite 2500		6 2023, and the time on the monitor is 9:32 a.m.
7	Atlanta, Georgia 30303		7 My name is Rocco Franco and I'm the
8	(404)658-9070		8 videographer. The court reporter is Ed Kidd.
9	BY: DAVID H. BOUCHARD, ESQ.		9 And we are here with Huseby Global Litigation.
10	david@finchmccranie.com		10 Counsel, please introduce yourselves after
11	On behalf of Defendant Northbrook Industries d/b/a		11 which the court reporter will swear in the
12	United Inn & Suites in the A.G. and G.W. Matters:		12 witness.
13	LEWIS, BRISBOIS, BISGAARD & SMITH, LLP		13 MR. BOUCHARD: Good morning. David
14	600 Peachtree Street Northeast		14 Bouchard for the law firm Finch McCranie on
15	Suite 4700		15 behalf of plaintiffs A.G., G.W. and J.G.
16	Atlanta, Georgia 30308		16 MR. ALLUSHI: Good morning. Adi Allushi
17	(404)348-8585		17 and Cameron Mobley is here as well from Lewis,
18	BY: ADI ALLUSHI, ESQ.		18 Brisbois, Bisgaard & Smith on behalf of United
19	CAMERON MOBLEY, ESQ.		19 Inn for the A.G. and G.W. cases.
20	adi.allushi@lewisbrisbois.com		20 MS. RICHENS: And I'm Dana Richens with
21	cameron.mobley@lewisbrisbois.com		21 Smith, Gambrell & Russell on behalf of
22	On behalf of Defendant Northbrook Industries d/b/a		22 Defendant Northbrook Industries, Inc. d/b/a
23	United Inn & Suites in J.G. Matter:		23 United Inn & Suites in the J.G. matter.
24	SMITH, GAMBRELL & RUSSELL, LLP		24 THE STENOGRAPHER: All right.
25	1105 West Peachtree Street Northeast		25 Mr. Vellani, would you kindly raise your right
	INDEX	Page 3	Page 5
1	Examination	Page	1 hand.
2	Direct	By Mr. Bouchard	2 Do you solemnly swear that the testimony
3	Cross	By Ms. Richens	3 you are about to give will be the truth, the
4	Redirect	By Mr. Bouchard	4 whole truth, and nothing but the truth?
5	Certificate of Oath	236	5 THE WITNESS: Yes, sir, I do.
6	Certificate of Reporter	237	6 Thereupon:
7	Errata Sheet (forwarded upon execution)	238	7 KARIM VELLANI
8	PLAINTIFF EXHIBITS		8 having been first duly sworn, was examined and
9	No.	Page	9 testified as follows:
10	1 TAG Threat Analysis Report J.G. vs. Northbrook	37	10 DIRECT EXAMINATION
11	2 TAG Threat Analysis Report A.G. vs. Northbrook	38	11 BY MR. BOUCHARD:
12	3 TAG Threat Analysis Report G.W. vs. Northbrook	38	12 Q. Good morning, Mr. Vellani. My name is
13	4 10/29/18 Email from Tim Wade to United Inn, Subject: Missing Person - Attachments: Bolo Jhordyn Grimes.docx	96	13 David Bouchard. We met briefly off the record.
14	5 Comprehensive Human trafficking Assessment	126	14 It's nice to see you this morning, sir.
15	6 Vellani Invoices Pertaining to A.G.	235	15 A. You too, sir. Nice to meet you.
16	7 Vellani Invoices Pertaining to G.W.	235	16 Q. And, sir, you understand that I represent
17	8 Vellani Invoices Pertaining to J.G.	235	17 the plaintiffs A.G., G.W. and J.G. in three separate
18	(Stenographer's Note: All documents were sent electronically. A digital sticker was placed on the documents which were marked during the proceeding.)		18 cases filed against United Inn and Suites. You
19			19 understand that?
20			20 A. Yes, I do.
21			21 Q. And you and I have not spoken prior to
22			22 today, is that correct, sir?
23			23 A. That is correct.
24			24 Q. You have never spoken to anybody from my
25			25 law firm. Is that also correct?

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 6..9

Page 6	Page 8
<p>1 A. I don't know. I don't think so.</p> <p>2 MR. BOUCHARD: All right. For the record,</p> <p>3 just a few preliminary items. This deposition</p> <p>4 is taken on behalf of plaintiff [A.G.] in case</p> <p>5 number 120-cv-05231. It has been cross-noticed</p> <p>6 in case number 120-cv-05232 which is [J.W.]'s</p> <p>7 lawsuit and in case number 120-cv-05233 which</p> <p>8 is [J.G.]'s lawsuit.</p> <p>9 And I will say for the record for the</p> <p>10 purposes of the court reporter, there is a</p> <p>11 confidentiality order in effect in all three</p> <p>12 cases. So while I will be referring to the</p> <p>13 plaintiffs at times by their full names, I</p> <p>14 would ask that all references to the plaintiffs</p> <p>15 be modified in the record to their first</p> <p>16 initials which is how the cases are captioned.</p> <p>17 Counsel for the defendants in all three cases</p> <p>18 are present after receiving reasonable notice</p> <p>19 of the deposition.</p> <p>20 Counsel, is it agreeable that all</p> <p>21 objections other than to the form of the</p> <p>22 question or to an issue of privilege are</p> <p>23 preserved?</p> <p>24 MS. RICHENS: Yes, and I would also like</p> <p>25 to confirm our agreement before we got on the</p>	<p>1 referring to the United Inn and Suites at 4649</p> <p>2 Memorial Drive in Decatur, Georgia, in slightly</p> <p>3 different ways. But, sir, I would like you to agree</p> <p>4 with me that our understanding today will be that</p> <p>5 when we're talking with the hotel or the United Inn</p> <p>6 or 4649 Memorial, we're talking about the same</p> <p>7 place, the United Inn and Suites. Is that</p> <p>8 agreeable, sir?</p> <p>9 A. Yes, sir.</p> <p>10 Q. I understand, Mr. Vellani, that you have</p> <p>11 been deposed before. Is that correct?</p> <p>12 A. Yes, sir.</p> <p>13 Q. I'm going to bypass the typical ground</p> <p>14 rules of the deposition because I'm comfortable and</p> <p>15 trusting that you understand them, sir, based on</p> <p>16 your experience in prior depositions. Just two</p> <p>17 points I did want to cover with you. One, if</p> <p>18 anybody needs to take a break but most importantly,</p> <p>19 you, Mr. Vellani, at any point in time, please let</p> <p>20 me know. I would just ask that you wait to ask for</p> <p>21 a break until after any pending questions have been</p> <p>22 answered in full. Is that fair?</p> <p>23 A. Yes, sir.</p> <p>24 MR. BOUCHARD: And I will note for the</p> <p>25 record, Dana, and Adi and Mr. Videographer, and</p>
Page 7	Page 9
<p>1 record to stipulate that any objection by</p> <p>2 counsel in one case would be deemed an</p> <p>3 objection similarly stated by counsel in the</p> <p>4 other case or cases so that we're not bogging</p> <p>5 down the stenographer.</p> <p>6 MR. BOUCHARD: That's confirmed, Dana.</p> <p>7 MR. ALLUSHI: Agreed on behalf of Lewis</p> <p>8 Brisbois, too.</p> <p>9 MR. BOUCHARD: This deposition is taken</p> <p>10 pursuant to properly served deposition notices</p> <p>11 and cross-notices and is taken for all purposes</p> <p>12 permitted under the Federal Rules of Civil</p> <p>13 Procedure and the Georgia Civil Practice Act</p> <p>14 including but not limited to preservation of</p> <p>15 testimony and cross-examination.</p> <p>16 Is that agreed, Counsel?</p> <p>17 MS. RICHENS: Why are you referencing the</p> <p>18 Georgia Civil Practice Act?</p> <p>19 MR. BOUCHARD: Because we have a</p> <p>20 negligence claim under Georgia law.</p> <p>21 MS. RICHENS: Okay. Fine.</p> <p>22 BY MR. BOUCHARD:</p> <p>23 Q. Mr. Vellani, today I'm going to be</p> <p>24 referring to "the United Inn and Suites," "the</p> <p>25 United Inn," "the hotel" at various points. I'll be</p>	<p>1 the court reporter, I have a brief call that I</p> <p>2 need to make at 11:00 a.m. So I am planning to</p> <p>3 take a break from probably 10:55 to</p> <p>4 approximately 11:05 or 11:10. Just for</p> <p>5 planning purposes, I'm letting everybody know</p> <p>6 that.</p> <p>7 BY MR. BOUCHARD:</p> <p>8 Q. Mr. Vellani, is there any reason that you</p> <p>9 are not in a position today to offer clear and</p> <p>10 correct testimony?</p> <p>11 A. No, sir, I'm able to do that.</p> <p>12 Q. You're in a position to provide reliable</p> <p>13 and trustworthy testimony today?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Thank you, sir.</p> <p>16 Mr. Vellani, do you have a law degree?</p> <p>17 A. I do not.</p> <p>18 Q. Have you attended law school?</p> <p>19 A. No, sir.</p> <p>20 Q. Have you taken the bar exam in any of the</p> <p>21 50 states?</p> <p>22 A. No, sir.</p> <p>23 Q. Have you ever filed a lawsuit?</p> <p>24 A. No, sir.</p> <p>25 Q. I take it you've never stood up in court</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 10..13

Page 10	Page 12
1 on behalf of a client as a lawyer representing a 2 client? 3 A. Let me back up. You say have I ever filed 4 a lawsuit. My company filed a lawsuit which I'm the 5 sole owner of. And I have stood up in court in 6 front of a judge and dealt with that lawsuit. 7 Q. Does that relate to business matters 8 before your company? 9 A. Yes, sir. 10 Q. Other than that, any other lawsuits you've 11 been involved with? 12 A. No, sir. 13 Q. Does the lawsuit pertain to your work as a 14 security consultant? 15 A. It was a small claim regarding unpaid 16 bills. 17 Q. Have you ever stood up in court on behalf 18 of a client as an advocate for a client? 19 A. No, sir. 20 Q. Have you ever worked for the judiciary? 21 A. No, sir. 22 Q. For a judge? 23 A. No, sir. 24 Q. Or a court? 25 A. Other than as an expert witness, no, sir.	1 Q. Are you a member of the American 2 Hospitality and Lodging Association? 3 A. No, sir. 4 Q. The Asian American Hotel Owners 5 Association? 6 A. No, sir. 7 Q. The Georgia Hospitality and Lodging 8 Association? 9 A. No, sir. 10 Q. Have you ever attended any of the 11 conferences put on by any of those hospitality trade 12 groups or organizations that I just named? 13 A. Not that I can recall, sir. 14 Q. Do you have a medical degree? 15 A. No, sir. 16 Q. Have you attended medical school? 17 A. No, sir. 18 Q. Do you consider yourself an expert in 19 medicine? 20 A. No, sir. 21 Q. Are you a psychiatrist? 22 A. No, sir. 23 Q. Are you a psychologist? 24 A. No, sir. 25 Q. Have you ever worked as a law enforcement
Page 11	Page 13
1 Q. Do you consider yourself or hold yourself 2 out to be an expert in the law? 3 A. No. 4 Q. Have you worked in the hospitality 5 industry? 6 A. I have provided consulting services in the 7 hospitality industry. I've never been employed by a 8 hotel. 9 Q. And we'll talk about consulting services 10 you provided to the hospitality industry later. But 11 for now, you've never been employed by a hospitality 12 services provider like a hotel, motel, or anything 13 else? 14 A. Correct. 15 Q. Do you have experience in hotel 16 operations? 17 A. Through my consulting practice, yes, sir. 18 Q. Do you consider yourself an expert in 19 hotel operations? 20 A. Well, the security operations, yes. 21 Q. What about nonsecurity operations? 22 A. I'm going to generally say no. 23 Q. Are you a member of any hospitality trade 24 groups or organizations? 25 A. No, sir.	1 officer? 2 A. No, sir. 3 Q. Do you have law enforcement training? 4 A. Yes, sir. 5 Q. What training do you have? 6 A. So my undergrad bachelor's degree is 7 criminal justice with a specialization in law 8 enforcement. I've also been trained by the Texas 9 Commission on -- well, now it's called TCOLE -- 10 Texas Commission on Law Enforcement standards with 11 respect to firearms training. 12 Q. Any other law enforcement training? 13 A. I've attended various trainings with 14 respect to criminal profiling, gang crimes. And 15 there might be some other ones listed on my CV. 16 Q. That's all that's coming to mind right 17 now, though? 18 A. Yes, sir. 19 Q. Have you ever investigated a crime 20 personally? 21 A. Yes. 22 Q. Which crimes? Can you tell me about that? 23 A. Well, there are times in my consulting 24 practice where I've had to do, you know, what I 25 would consider to be HR-related investigations. I

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 14..17

Page 14	Page 16
<p>1 also worked as a private investigator before working 2 for a consulting firm. So there were various 3 different types of crimes.</p> <p>4 Q. Let me ask it this way: Have you ever 5 investigated a crime as a law enforcement officer?</p> <p>6 A. No, sir.</p> <p>7 Q. Have you ever made an arrest?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you consider yourself an expert in law 10 enforcement?</p> <p>11 A. No, sir.</p> <p>12 Q. Have you ever worked as a service provider 13 for sex trafficking victims or survivors?</p> <p>14 A. No, sir.</p> <p>15 Q. Have you ever worked for a sex trafficking 16 survivors or victims organization?</p> <p>17 A. No, sir.</p> <p>18 Q. Have you ever interviewed a sex 19 trafficking victim or survivor?</p> <p>20 A. I don't know that we were using those 21 terms back in 2009. So given we weren't using those 22 terms specifically, the answer would be no.</p> <p>23 Q. Who were you thinking of in 2009?</p> <p>24 A. So in 2009 I was hired by a law firm who 25 was working for the mayor's office of Houston to</p>	<p>1 trafficking.</p> <p>2 So I think, you know, like law 3 enforcement, they make an initial assumption on 4 whether the person is a criminal or victim. But 5 ultimately, it's the DA that makes that decision. 6 Then I assume at some point it's the judge's 7 decision.</p> <p>8 Q. Have you ever interviewed an individual 9 who was engaged in commercial sex activity as a 10 minor?</p> <p>11 A. Well, I don't know the ages of those 12 people I was mentioning. So I don't know.</p> <p>13 Q. Have you ever worked on a sex trafficking 14 case as a law enforcement officer?</p> <p>15 A. No, I've never been a law enforcement 16 officer.</p> <p>17 Q. I understand that you worked for the 18 Department of Homeland Security for 11 years. Can 19 you tell me what your role there entailed, sir?</p> <p>20 A. Yeah, I didn't work directly for DHS. 21 This actually was a project that started pre-9/11. 22 It's an entity called Federal Protective Service 23 which is now under Homeland Security. Previously it 24 was under the General Services Administration. So 25 what I did is -- this was, you know, early in my</p>
Page 15	Page 17
<p>1 evaluate specific hotels where there was a lot of 2 vice activity and potential sex trafficking going 3 on. That was -- so that was 2009. It was on the 4 heels of the Wilberforce TVPRA 2008 law. So during 5 that time I did interview prostitutes. Whether they 6 were trafficking victims or not, I don't know. 7 That's not my call.</p> <p>8 Q. How many did you interview during that 9 time in connection with that project that you're 10 describing?</p> <p>11 A. Probably around half a dozen. Half a 12 dozen to a dozen.</p> <p>13 Q. Have you interviewed any sex trafficking 14 victims or survivors since that project that you're 15 describing in 2009?</p> <p>16 A. No, sir.</p> <p>17 Q. You mentioned that it wasn't your call to 18 determine whether they were prostitutes or sex 19 trafficking victims. What did you mean by that?</p> <p>20 A. Well, obviously, we're dealing with -- in 21 this situation we're dealing with the Texas penal 22 code. So is not up to me to make that 23 determination. Ultimately, I think that's the DA's 24 decision as to whether to charge someone with, you 25 know, being a prostitute or being a victim of sex</p>	<p>1 company's history. So I took a job working for a 2 company called, SEG, Inc., as a quality control 3 monitor wherein I would go to federal buildings 4 across Texas initially and inspect the security 5 officers that were assigned to those federal 6 buildings that was everything from a federal 7 building like the Murrah Federal Building in 8 Oklahoma, that kind of building and everything down 9 to a small little social security office that was 10 next to a Walmart in some small town. So I 11 inspected the security officers, ensuring they were 12 in compliance with the contract and ensuring they 13 were in compliance with the policies and procedures 14 of the company. And inspected their morale, 15 inspected their uniform. That kind of stuff. That 16 eventually grew into a contract for my company where 17 I believe we were in 23 states and on a monthly 18 basis we were inspecting about 11- -- 1,000 to 1100 19 officers every month across 700 federal buildings in 20 23 states, and that varied over time.</p> <p>21 Q. Did your job consist of any other duties 22 or responsibilities other than what you just 23 described or is what you just provided a fair 24 summary?</p> <p>25 A. No. That was the bulk of it. There were</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 18..21

Page 18	Page 20
<p>1 times I had to go out and do an HR investigation. 2 In fact, that is what I was doing on 9/11 for work. 3 I was conducting an investigation that was related 4 to, you know, kind of a human resources type of an 5 issue. I have also assisted that company with 6 hiring security officers at the start of new 7 contracts. So there were some ancillary stuff that 8 happened during that 11 years, but the bulk of it 9 was what I mentioned.</p> <p>10 Q. Do you hold yourself out as an expert in 11 sex trafficking?</p> <p>12 A. I hold myself as an expert in crime 13 analysis and crime prevention wherein I look at 14 different types of crime. Sex trafficking being one 15 of them. But would I hold myself out as an expert 16 in sex trafficking exclusively? No. It would be 17 all within the confines of security and crime 18 prevention.</p> <p>19 Q. Do I understand correctly, Mr. Vellani, 20 that you are a CPP and a CSC?</p> <p>21 A. Yes, sir.</p> <p>22 Q. I just want to ask you about those. What 23 is CPP?</p> <p>24 A. So a CPP stands for Certified Protection 25 Professional. It's kind of a gold standard in the</p>	<p>1 on a project and win a project. So it comes in 2 handy in that situation. I don't know anything, you 3 know, beyond that what it does.</p> <p>4 Q. Does it enable you to conduct risk 5 assessments?</p> <p>6 A. Well, risk assessments can be done without 7 a CPP. But, again, it depends on what the client's 8 requirements are. If they have a requirement for a 9 CPP to do a risk assessment at the property, then it 10 does. But most clients don't require that.</p> <p>11 Q. Most clients, you're saying, interested in 12 a risk assessment do not require a CPP, is that 13 fair?</p> <p>14 A. Yeah. I think probably 70 percent. Just 15 looking back on my consulting practice, probably 16 70 percent have no preference to the CPP whatsoever. 17 Probably about 25 percent have it as a preference 18 and maybe 5 percent require it.</p> <p>19 Q. If a client came to you and said, "Hey, 20 we're looking at you considering you or we're also 21 considering somebody else who doesn't have a CPP to 22 conduct a risk assessment that we want done," what 23 would your opinion be about whether they would get 24 just as good a job from somebody who didn't have a 25 CPP as if they got it done from you?</p>
<p style="text-align: center;">Page 19</p> <p>1 security industry. It is a certification that is 2 hosted by the -- by what's now called ASIS 3 International which used to be called American 4 Society for Industrial Security. It's the largest 5 security association in the world. Basically, it's 6 a self-study program where you can attend classes, 7 either hosted at the local chapter or at, you know, 8 headquarters, I guess, during the annual conference. 9 It took me about a year to study for it because I 10 did not want to fail the test. Took the test, 11 passed the test. And there's a recertification, I 12 think, every three years.</p> <p>13 Q. Did you find it to be a fairly rigorous 14 process?</p> <p>15 A. Very much.</p> <p>16 Q. What does the CPP credential signify in 17 terms of what you're able to do?</p> <p>18 A. Well, like I said, it's kind of the gold 19 standard for the security industry. I don't know 20 that it necessarily qualifies me to do anything. It 21 basically says I have this baseline of knowledge.</p> <p>22 There are times when I'm bidding on 23 projects where they require a CPP. So, you know, 24 there are some clients that require it in order to 25 hire you or in order for you to be qualified to bid</p>	<p style="text-align: center;">Page 21</p> <p>1 MR. ALLUSHI: Objection.</p> <p>2 A. I don't -- I don't think the CPP has that 3 kind of power. I think the -- I think the quality 4 of the risk assessment is based on the quality of 5 the individual conducting the risk assessment. So 6 I've written extensively. Researched extensively. 7 I published a book and two editions and a third one 8 on the way regarding risk assessments. I think that 9 makes me far more qualified than a CPP would grant 10 me. I'm not trying to diminish the certification, 11 but I don't think it has the kind of power you're 12 suggesting it might have.</p> <p>13 Q. Do you believe that the CPP qualifies you 14 to serve as a forensic security consultant?</p> <p>15 A. No. It's not a requirement.</p> <p>16 Q. What qualifies you to serve as a forensic 17 security consultant?</p> <p>18 MS. RICHENS: Objection.</p> <p>19 A. Ultimately, I think that's the judge's 20 decision, right? That's not my decision, it's not 21 your decision, that's not defense counsel's 22 decision. That's the judge's decision. The CPP 23 might play into the qualifications but I don't think 24 that's the end-all be-all.</p> <p>25</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 22..25

Page 22	Page 24
<p>1 BY MR. BOUCHARD:</p> <p>2 Q. And I'm not suggesting that it is. I'm 3 just asking what do you believe qualifies you to 4 serve as a forensic security consultant?</p> <p>5 A. So, again, if you look at my CV, number 6 one, starting with the education, you know, I've got 7 a bachelor's degree in criminal justice with a 8 specialization in law enforcement. I have a 9 master's degree in criminal justice management. 10 I've got extensive experience including working for 11 another expert witness when I first got into this 12 business. You know, while an undergrad during an 13 internship, I have published extensively in the area 14 of security. I have written extensively, researched 15 extensively in the field of crime prevention, crime 16 analysis and security risk assessments. So that's 17 probably the core of it.</p> <p>18 On top of that, I have the certifications. 19 You know, on top of that I've been, you know, 20 allowed to testify in court in I think 9 or 10 21 trials.</p> <p>22 Q. Do you think research or publications 23 aren't necessary to establish somebody as a forensic 24 security consultant?</p> <p>25 A. So are you asking that in the eyes of the</p>	<p>1 what that means and what it entails?</p> <p>2 A. Sure, so the CSC is a Certified Security 3 Consultant. It is a certification that is hosted by 4 the International Association of Professional 5 Security Consultants. It basically demonstrates 6 that you have the knowledge within the security 7 consulting field and it looks at -- I don't know 8 about today, but when it started it looked at three 9 different domains. Physical security, security 10 management and forensic security.</p> <p>11 Q. Have you been evaluated on all three of 12 those domains or one but not the other? Can you 13 explain that, please?</p> <p>14 A. Yes. I mean, you're taxing my brain here. 15 I'm trying to remember the history of this. So as I 16 recall, you're tested on all three domains plus 17 ethics. So you certainly have to have a baseline 18 knowledge in all three areas. But you most 19 certainly had to excel at one or two of the areas in 20 order to pass the test. I mean, in other words, you 21 couldn't just have knowledge in one area and pass 22 the test.</p> <p>23 Q. I understand. Which of those areas are 24 you the strongest in? Which of those three are you 25 the strongest in and which are you comparatively</p>
Page 23	Page 25
<p>1 courts? Because, I mean --</p> <p>2 Q. No, I'm not. I'm asking that of 3 Karim Vellani. I'm not asking you to speak as the 4 court.</p> <p>5 A. So it is my belief that research and 6 publishing is a critical requirement to show or to 7 demonstrate that one is up to speed in their field 8 of study. And can then, you know, testify as an 9 expert witness. Is it a necessity? Not that I'm 10 aware of. Because, obviously, at some point we all 11 start off as an expert without those publications 12 sometimes.</p> <p>13 Q. Do you agree that the CPP certification 14 means that the applicant has demonstrated knowledge 15 and competency in seven key domains of security?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Do you agree that the CPP certification is 18 globally recognized as the standard of excellence 19 for security management professionals?</p> <p>20 A. It's certainly the marketing pitch for the 21 ASIS.</p> <p>22 Q. Do you quibble with that or disagree with 23 it?</p> <p>24 A. No, I don't disagree with it.</p> <p>25 Q. You also are a CSC. Can you tell me about</p>	<p>1 weaker in?</p> <p>2 A. So I would say -- 3 (Zoom distortion.)</p> <p>4 A. -- security management -- well, at the 5 time that I took the exam, I would say security 6 management would be my strongest suit followed by 7 forensic security followed by physical security and 8 I think that's still true today.</p> <p>9 Q. Does the CSC, in your opinion, 10 Mr. Vellani, qualify you to do things that the CPP 11 that you also have does not qualify you to do?</p> <p>12 A. Well, again, you say "qualify." I mean, 13 as independent security consultants, which I am, you 14 know, it's in the eye of the buyer, right? So 15 ultimately you are selling your services and if the 16 client deems it necessary or preferential, then, 17 yes. If they don't, then, no.</p> <p>18 Q. As a security professional, somebody who 19 works in the security industry, in your opinion, 20 does the CSC qualify you to do things that somebody 21 without a CSC is not qualified to do?</p> <p>22 A. Again, I'm not the buyer, right? So if 23 somebody is trying to hire me as a security 24 consultant, they place value on the CSC. I don't 25 get to make that decision. That's in the eye of the</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 26..29

Page 26	Page 28
1 buyer. 2 Q. Is it fair to say you don't have an 3 opinion on that or you don't hold an opinion on 4 that? 5 MR. ALLUSHI: Objection. 6 A. So I think the CSC is good. I think it's 7 great. But, you know, I'm not the one that's doing 8 the hiring, right? That is up to -- in the case of 9 my consulting practice, that is up to my client to 10 make that decision whether they hold value in that 11 or, you know, in the case of litigation, whether the 12 judge sees value in that. 13 Q. I understand what you're saying. But I'm 14 not asking for, you know, what your client might 15 think or believe. I'm asking for what you think or 16 believe. Do you have anything further to add or 17 have you answered the question? 18 MR. ALLUSHI: Objection. 19 A. Well, like I mentioned, I think the CSC is 20 a very good certification. I think the -- the fact 21 that it requires, you know, much like the CPP, the 22 CSC also requires recertification demonstrating, you 23 know, experience, education, training, you know, 24 presentations that you have given, participation in 25 the industry. I think all of those things are a	1 Q. Have you spoken to Kikia Anderson? 2 A. I don't know who that is, sir. 3 Q. I take it then you have not asked to speak 4 to her since you don't know who that is, is that 5 fair? 6 MR. ALLUSHI: Objection. 7 A. Correct. 8 BY MR. BOUCHARD: 9 Q. Have you asked Kikia Anderson how often 10 she trafficked minors at United Inn? 11 MR. ALLUSHI: Again, I'm going to object 12 to this. He said he doesn't know who that is. 13 What's the point of asking the questions, 14 David? 15 MR. BOUCHARD: Adi, you can have a 16 standing form objection to this line of 17 questioning. That's fine. 18 BY MR. BOUCHARD: 19 Q. Have you asked Kikia Anderson how often 20 she trafficked minors at the United Inn, 21 Mr. Vellani? 22 A. No, sir. 23 Q. Have you asked her why she chose the 24 United Inn? 25 A. No, sir.
Page 27	Page 29
1 good thing. 2 BY MR. BOUCHARD: 3 Q. Have you spoken to Plaintiff G.W. before? 4 A. No, sir. 5 Q. Have you ever asked to do so? 6 A. No, sir. 7 Q. Have you ever spoken to Plaintiff A.G. 8 before? 9 A. No, sir. 10 Q. Have you asked to do so? 11 A. No, sir. 12 Q. Have you spoken to Zaccheus Obie. 13 A. No, sir. 14 Q. Have you asked to do so? 15 A. No, sir. 16 Q. Have you asked Zaccheus Obie how often he 17 trafficked minors at the United Inn? 18 A. No, sir. 19 MR. ALLUSHI: Objection. 20 BY MR. BOUCHARD: 21 Q. Have you asked him why he chose the 22 United Inn? 23 MR. ALLUSHI: Objection. 24 A. No, sir. 25 BY MR. BOUCHARD:	1 Q. Have you spoken to Plaintiff J.G.? 2 A. No, sir. 3 Q. Have you asked to do so? 4 A. No, sir. 5 Q. Have you spoken to any of her alleged 6 traffickers: Shaq, Shay, Cash or King? 7 A. No, sir. 8 Q. Have you asked to do so? 9 A. No, sir. 10 Q. Have you asked any of J.G.'s traffickers 11 how often they trafficked minors at the United Inn? 12 MS. RICHENS: Objection. 13 A. No, sir. 14 BY MR. BOUCHARD: 15 Q. Have you asked any of J.G.'s traffickers 16 why they chose the United Inn? 17 MR. ALLUSHI: Objection. 18 A. No, sir. 19 BY MR. BOUCHARD: 20 Q. Have you spoken to Ashar Islam? 21 A. No, sir. 22 Q. Have you asked to do so? 23 A. I don't know. I don't think so. 24 Q. I understand that you have spoken to 25 Tahir Shareef?

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 30..33

Page 30	Page 32
1 A. Yes, sir.	1 alleged in the complaints, is that fair?
2 Q. How many times have you spoken to	2 A. That's fair.
3 Tahir Shareef?	3 Q. Are you going to provide an opinion at
4 A. I believe it was just one time.	4 trial about whether Plaintiff G.W. is credible?
5 Q. Have you personally visited the United	5 A. No, sir.
6 Inn?	6 Q. What about whether Plaintiff J.G. is
7 A. Yes, sir.	7 credible?
8 Q. I'm going to ask you about that a little	8 A. No, sir.
9 bit later but just for now I wanted to ask have you	9 Q. Or whether Plaintiff A.G. is credible?
10 stayed at the United Inn?	10 A. No, sir.
11 A. No, sir.	11 Q. Are you going to provide an opinion at
12 Q. Have you asked to stay at the United Inn?	12 trial about whether Tahir Shareef is credible?
13 A. No, sir.	13 A. No, sir, I don't make credibility
14 Q. When did you first visit the United Inn?	14 judgments.
15 A. January 17, 2023.	15 Q. I take it it's the same answer as to
16 Q. So you never went to the United Inn in the	16 Ashar Islam?
17 years 2017, 2018, or 2019, is that correct?	17 A. Correct.
18 A. Correct.	18 Q. We're going to talk about your expert
19 Q. Where did you stay when you came to	19 reports here shortly, sir. But just at the outset
20 Atlanta in January 2023?	20 before we get into them, I wanted to ask you are all
21 A. I don't know, sir. You know, I mean, I	21 of the opinions that you hold in the A.G., G.W., and
22 stayed in various hotels in Atlanta, depending where	22 J.G. cases set forth in your expert reports?
23 I got to be. I don't know where I stayed that	23 A. Yes, sir.
24 particular trip.	24 Q. Are there any opinions you're going to
25 Q. But you know you did not stay at the	25 offer at trial that are not set forth in the expert
1 United Inn?	reports?
2 A. Correct.	2 A. I assume that you will be eliciting
3 Q. Is that correct?	3 further opinions from me or sub-opinions to my
4 Are you familiar or are you aware with	4 primary opinion and certainly defense counsel may do
5 internet websites that existed in 2017, 2018, and	5 the same. So I can't answer that definitively.
6 2019 to advertise sex for money?	6 What I can tell you is that whatever opinions you
7 A. Some of them, yes.	7 guys elicit, I would assume they would fall under
8 Q. Which of the websites are you familiar	8 the general opinion I've given already.
9 with, sir?	9 Q. And as you're sitting here right now,
10 A. Well, Backpage is the obvious answer. You	10 you're not aware of any other new or different
11 know, there were some other ones. USA Sex Guide. I	11 opinions that aren't already contained in your
12 don't believe Craig's List was doing advertisements	12 reports that you prepared in this case?
13 back then. But they might have been. You know,	13 A. That's correct.
14 there's other ones. Rubmaps comes to mind.	14 Q. Do you plan to provide an opinion at trial
15 Q. Did you do any research as part of your	15 about whether plaintiffs were or were not trafficked
16 engagement in this case about the United Inn on any	16 at United Inn?
17 of the websites you just mentioned?	17 A. I already stated that as a fact in the
18 A. Well, Backpage didn't exist when I was	18 reports.
19 engaged with this, when I was initially engaged with	19 Q. Do you plan to provide an opinion at trial
20 this lawsuit and I did not look at any of the other	20 about whether plaintiffs were minors engaging in sex
21 ones. It wouldn't do me any good, obviously, I'm	21 for money at United Inn?
22 four, five years removed from the time of the	22 A. I don't remember exactly how I worded it
23 incident.	23 in the reports but I think I already acknowledged
24 Q. Mr. Vellani, you're, obviously, not	24 that factually they're victims of sex trafficking by
25 claiming to be an eyewitness to any of the events	25 virtue of their age.

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 34..37

Page 34	Page 36
<p>1 Q. Will you provide an opinion at trial, 2 Mr. Vellani, about whether sex trafficking was 3 foreseeable at United Inn?</p> <p>4 A. So I don't -- you know, my opinion is 5 contained in here in this -- these reports. And I 6 don't use the word foreseeability in these reports. 7 So the answer would be no. But, you know, again, if 8 the judge asked me the question, I would certainly 9 answer it.</p> <p>10 Q. Will you provide an opinion at trial about 11 whether United Inn knew or should have known that 12 plaintiffs were sex trafficking victims?</p> <p>13 A. I think I addressed that in my report as 14 well. They certainly didn't have knowledge of it.</p> <p>15 Q. When you say that "they certainly didn't 16 have knowledge of it," are you saying that, in fact, 17 the defendant, United Inn and Suites, did not have 18 knowledge of it, or are you saying based on your 19 review of the discovery materials, you've concluded 20 that they did not have knowledge of it?</p> <p>21 MR. ALLUSHI: Object to the form.</p> <p>22 A. The latter, but also the interview that I 23 conducted. So based on the discovery materials that 24 I reviewed, I see no evidence that they were aware 25 of it. And also, I spoke to Mr. Shareef and I don't</p>	<p>1 Q. Is that what your opinions, in your mind, 2 Mr. Vellani, concern, that is, the standard of care?</p> <p>3 A. That would be the primary opinion, yes, 4 would be the standard of care. But like I said, 5 there may be -- there are certainly sub-opinions 6 under that that I'm sure you'll elicit or defense 7 counsel will elicit.</p> <p>8 Q. Will you provide an opinion at trial about 9 whether defendant should or should not be found 10 liable for the causes of action set forth in the 11 complaints?</p> <p>12 A. Seems like a jury decision to me.</p> <p>13 MR. ALLUSHI: Object to the form.</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q. Will you provide an opinion at trial about 16 whether plaintiffs have suffered damages?</p> <p>17 A. No, sir.</p> <p>18 Q. Will you provide an opinion at trial about 19 the adequacy of plaintiffs' allegations?</p> <p>20 A. I'm going to say no, but I don't know what 21 you're saying. Adequacy of their allegations?</p> <p>22 Q. The suspicion -- let me try to rephrase 23 that.</p> <p>24 Will you provide an opinion at trial, 25 Mr. Vellani, about whether plaintiffs have</p>
Page 35	Page 37
<p>1 see any -- he didn't know about any of this.</p> <p>2 BY MR. BOUCHARD:</p> <p>3 Q. I asked you previously if you're planning 4 to offer credibility determinations at trial. Do 5 you recognize that if there's a divergence between 6 what the plaintiffs say and what Tahir Shareef or 7 Ashar Islam say on behalf of United Inn and Suites, 8 the fact finder in the case, that is the jury, may 9 have to make a credibility determination?</p> <p>10 A. Yes, I understand that.</p> <p>11 Q. Are you intending to come into the 12 courtroom as an expert and say I vouch for the 13 credibility of Tahir Shareef and what he told me?</p> <p>14 MR. ALLUSHI: Objection.</p> <p>15 A. No, sir.</p> <p>16 BY MR. BOUCHARD:</p> <p>17 Q. I didn't hear your answer.</p> <p>18 A. No, sir.</p> <p>19 Q. Do you intend to provide an opinion at 20 trial about whether United Inn had certain duties 21 under the law?</p> <p>22 A. I mean, that sounds like a legal analysis 23 that I would have to do. So I would say generally 24 no. What my opinions would be -- would be regarding 25 the standard of care.</p>	<p>1 sufficiently alleged their causes of action in order 2 to -- for United Inn to be found liable?</p> <p>3 MR. ALLUSHI: Objection.</p> <p>4 A. I'm going to say no. I don't fully 5 understand what you're saying but...</p> <p>6 BY MR. BOUCHARD:</p> <p>7 Q. Mr. Vellani, do you have your expert 8 reports printed out in front of you or do you have 9 them otherwise available?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Okay. Are you going to be referring to 12 the electronic copies or paper copies?</p> <p>13 A. The electronic copies.</p> <p>14 Q. And you're comfortable with the 15 electronic, sir?</p> <p>16 A. Certainly more so than paper.</p> <p>17 Q. I am, too, but not everybody is of that 18 stripe. So I just wanted to confirm.</p> <p>19 A. Yes, sir.</p> <p>20 Q. I'm going to identify your expert report 21 in the J.G. matter as Exhibit 1. 22 (Thereupon, marked as Plaintiff 23 Exhibit 1.)</p> <p>24 MR. BOUCHARD: Your expert report in the 25 A.G. matter as Exhibit 2.</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 38..41

Page 38	Page 40
1 (Thereupon, marked as Plaintiff 2 Exhibit 2.) 3 MR. BOUCHARD: And your expert report in 4 the G.W. matter as Exhibit 3. 5 (Thereupon, marked as Plaintiff 6 Exhibit 3.) 7 BY MR. BOUCHARD: 8 Q. Mr. Vellani, I'll represent that the 9 reports I have seen that I have copies of are dated 10 June 14, 2023. 11 A. Yes, sir. 12 Q. Are those the most up-to-date reports that 13 you have prepared? 14 A. Yes, sir. 15 Q. Have you made any changes to your reports 16 since June 14th, 2023? 17 A. No, sir. 18 Q. Do you agree that the opinions provided in 19 Exhibits 1, 2, and 3, that is, the J.G. report, the 20 A.G. report, and the G.W. report are identical 21 opinions? 22 A. The opinions are identical. The actual 23 reports are not entirely identical. 24 Q. What are the differences between the 25 reports in the three cases?	1 that I set the three reports down and went through 2 them and my list is very similar to yours. Let me 3 just kind of compare and confirm here, if I can. 4 A. Sure. 5 Q. Looking at the table of contents for 6 Plaintiffs' Exhibit 1 which is the J.G. report, I 7 believe that the following sections have some 8 differences across the three reports. The materials 9 received section? 10 A. Yes, sir. 11 Q. The subject incident background section? 12 A. Yes, sir. 13 Q. The analysis of crime at the United Inn 14 and Suites section? 15 A. Yes, sir. 16 Q. The awareness section? 17 A. I don't know if there was a difference 18 there. Was there? Let me take a quick look at 19 that, if you don't mind. Give me one second, sir. 20 Q. No problem. 21 A. Yeah, I mean, there's a difference there 22 because that's referring to that knocking loudly on 23 the door. Yeah. There is a difference there. 24 Q. And the last section, referring back to 25 the table of contents, where I saw a difference
1 A. Well, I'm going to go from mostly memory 2 here. But I'll also flip through them. Obviously, 3 the material reviewed is different in each case. Or 4 at least the difference between A.G., G.W., and then 5 separately, J.G.'s got, you know, different 6 documents. The background section for each incident 7 is different. Each is, you know, specific to each 8 of the plaintiffs. There was the issue with J.G. 9 when the police were on-site that is specifically 10 addressed. There is the incident with respect to 11 the period -- the period for the crime analysis that 12 I looked at would be different based on the period 13 of trafficking. Because each -- all three were 14 different. The crime history on the property which 15 would be within the scope of my crime analysis are 16 different because the trafficking periods are 17 different. A.G. and G.W. have that specific 18 incident and the people knocking on their door. You 19 know, that didn't apply to the J.G. report. So 20 that's different. There's also that situation where 21 A.G. and G.W. lost the key, their guest room key. 22 So that would be different and wouldn't apply to 23 J.G. So those are -- I think I've hit all the 24 differences. 25 Q. So I can represent to you, Mr. Vellani,	1 between the three reports, was the guest management 2 section. Do you agree with that? 3 A. Is that regarding the -- yeah, that's the 4 difference with the lost room key, yes, sir. 5 Q. I'm not aware based on my review of the 6 reports of any other sections that are different 7 between the three reports. Does my summary there 8 seem reasonable to you, Mr. Vellani? 9 A. Yes, sir. Well. Let me back up. The 10 Appendix C is different. 11 Q. Yes, sir. That's correct. I missed that. 12 And I appreciate the clarification. Any other 13 sections other than the ones I've listed and what 14 you just flagged that you're aware of? 15 A. I don't think so. 16 Q. Looking at page 1 and, again, because the 17 majority of the sections across the three reports 18 are similar, or identical, rather, Mr. Vellani, I'm 19 going to generally be referring to Exhibit 1 which 20 is Plaintiff J.G.'s report, okay? 21 A. Okay. 22 Q. Where there are differences between the 23 three reports, I will perhaps ask you specific 24 questions about those differences. And if you're 25 aware of differences that are relevant to the

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 42..45

Page 42	Page 44
<p>1 questions I'm asking, I would like you to raise 2 those differences with me. Is that fair? 3 A. That's fair. 4 Q. Just a quick question on page 1 of 5 Exhibit 1, sir, you say "This report may be 6 supplemented as additional discovery is made 7 available and other case activity is completed." 8 You've mentioned that the reports dated 9 June 14th are the most up to date and they have not 10 been updated since then. As you sit here today, do 11 you intend to supplement the June 14th reports? 12 A. Only if there's additional discovery that 13 I got access to. As of right now, there is nothing 14 else.</p> <p>15 Q. Are there any materials you needed to 16 prepare your reports that you did not receive? 17 A. No, sir. 18 Q. And I take it -- 19 A. Let me be clear about one thing. There is 20 no other discovery. There is other research that 21 I've looked at since these reports were published. 22 So those other studies I think you were provided a 23 list of the human trafficking references. There is 24 a couple studies in there that I may address. But 25 that's certainly not part of the discovery in this</p>	<p>1 A. So, I mean, let me kind of back up and 2 give you my recollection of that project. So a law 3 firm called -- that was retained by the mayor's 4 office, I went downtown, met with them. They 5 explained what the concerns were, what the project 6 was, what they wanted me to ultimately do. So as I 7 recall, I treated it no different than I do any of 8 my other security risk assessment projects which 9 means that I started with evaluating the crime 10 statistics for the individual hotels that I was 11 looking at. So I pulled the -- requested the 12 current data from Houston Police Department for the 13 specific hotels, did a deep dive on -- I can't 14 remember in 2009 if that was, like, offense data or 15 call for service data, but regardless, it was some 16 kind of raw data. Pulled that data, analyzed that 17 data. And then I went back and requested police 18 reports on specific incidents. I recall at some 19 point going to the property, spending a lot of time 20 at these different hotels. And then as I mentioned, 21 I also interviewed some of the, you know, the 22 prostitutes that were working that area. 23 I also interviewed some of the hotel 24 managers and hotel staff that were working there. I 25 went back at night, did an assessment.</p>
<p style="text-align: center;">Page 43</p> <p>1 case. 2 Q. And I take it your answer as to your 3 intent to supplement your report and any materials 4 you needed that you have not received would be the 5 same for the A.G. and G.W. reports, is that correct? 6 A. Correct. 7 Q. Mr. Vellani, let's take a look at page 3, 8 the second paragraph of page 3, and we're looking at 9 Plaintiffs' Exhibit 1 which is the J.G. report. 10 Page 3, paragraph 2. Which starts, "Karim's 11 practical experience in mitigating sex 12 trafficking..." Do you see that, sir? 13 A. Yes, sir. 14 Q. You're familiar with that paragraph, of 15 course? 16 A. Yes, sir. 17 Q. What sex trafficking stress and 18 vulnerabilities, to use the language from paragraph 19 two here did you identify at specific hotels in 20 Houston? 21 A. I'm sorry. What specific threats and 22 vulnerabilities? 23 Q. What sex trafficking threats and 24 vulnerabilities did you identify at specific hotels 25 in Houston?</p>	<p style="text-align: center;">Page 45</p> <p>1 So ultimately -- because this was for a 2 number of different hotels. There were several 3 different crime analyses that were done. One for 4 each one. And then one generally for the area that 5 we were looking at. So that was the threat 6 assessment part. 7 The vulnerability assessment was unique to 8 each individual hotel. Some of these were motels, 9 some of them were hotels. Some of them had, like, 10 a -- I want to say like a motor court. The one that 11 I'm thinking of, you drove into, you know, you drove 12 in off the street into an enclosed parking area and 13 it was enclosed by the structural buildings. The 14 actual buildings of the motel. So some of them had 15 night windows only. Some of them had different 16 signage. Some of them had a front desk that was 17 accessible by guests, some of them were not. So the 18 vulnerabilities were unique to each one. The threat 19 assessment was also unique to each one. 20 Q. How do you distinguish between a threat 21 assessment and vulnerability assessment? 22 A. So there is -- basically, if you you've 23 ever looked at my books, Strategic Security 24 Management, there is a five-step process for 25 evaluating risks. Step number one is to identify</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 46..49

Page 46	Page 48
<p>1 what we're trying to protect. That's the asset 2 identification. The second thing is the threat 3 assessment. That means what are we protecting 4 against. So threat assessment, what are we 5 protecting against?</p> <p>6 The third part is an evaluation of the 7 security measures in place.</p> <p>8 And the fourth part is the vulnerability 9 assessment which is where you're looking for the 10 gaps in the security program.</p> <p>11 And then ultimately it culminates in the 12 fifth step which is the risk assessment itself. So 13 threats are, you know, what we're protecting against 14 and vulnerabilities are the gaps or weaknesses in 15 the security program.</p> <p>16 Q. In looking back at Exhibit 1, your report, 17 in the J.G. matter, it says that you, quote -- I'm 18 changing the verb tense here -- "identified threats 19 and vulnerabilities at specific hotels..."</p> <p>20 Do you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. What do you mean, like, what did you 23 identify?</p> <p>24 A. So like I said, I pulled -- for the threat 25 assessment part, you know, obviously, I listened to</p>	<p>1 entailed, you know, various types of vice crimes. 2 I'm sure there were some of those hotels that 3 actually had prostitution or arrests. And in the -- 4 specifically, I mean, with respect to the 5 vulnerabilities, all I can recall is that I came up 6 with a list of evidence-based measures that would 7 work to try to thwart -- like, for example, some of 8 those hotels were renting by the hour. So that was 9 something that ultimately was in my report that they 10 needed to change.</p> <p>11 But as far as what the specific 12 vulnerabilities were, you know, I don't recall a 13 whole lot of them other than that one that keeps 14 coming to mind where I can envision, you know, the 15 driving in from the street and having only that one 16 access point which was a good thing. But, 17 unfortunately, it was being used in a nefarious way.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. Did you prepare and submit a report with 20 your findings to the City of Houston?</p> <p>21 A. I don't know if I submitted a report in 22 writing. I recall going back down to the -- going 23 back downtown and meeting with the attorneys and 24 giving them some documentation regarding 25 evidence-based practices. But I don't know if I</p>
<p>1 the client about what their concerns were. I 2 listened to the hotels about what their concerns 3 were. Whether it was, you know, clerks, hotel staff 4 or management. I pulled the crime data for the 5 property. And then secondly, the vulnerability 6 assessment is where I actually went on-site, 7 conducted interviews, reviewed the security measures 8 in place at each hotel. And then further refined 9 the threat assessment based on specific concerns I 10 heard from staff and management on-site.</p> <p>11 Q. So I appreciate -- as I understand your 12 answer, you're sort of walking me through the 13 process and procedure you followed to prepare your 14 analysis?</p> <p>15 A. Yes, sir.</p> <p>16 Q. My question is intended to get more at 17 what the conclusions were as it relates to threats 18 and vulnerabilities. And I understand they were 19 hotel specific. But can you give me some examples, 20 please, of your conclusions as to the threats and 21 vulnerabilities at the hotels you were involved with 22 looking at.</p> <p>23 MR. ALLUSHI: Objection.</p> <p>24 A. We're talking 15 years ago. I don't 25 recall the specific threats. I can imagine they</p>	<p>1 actually wrote a report or they wrote the report. I 2 don't recall that.</p> <p>3 Q. You say in the same paragraph here that 4 you developed methods for mitigating the risk of sex 5 trafficking and vice crimes. Can you tell me what 6 methods you developed for mitigating the risk of sex 7 trafficking and vice crimes?</p> <p>8 A. Well, the one that comes to mind is the 9 hourly rentals. That was probably the -- that's the 10 thing that's sticking in my mind. You know, what 11 the other ones were, I don't recall off the top of 12 my head. I mean, that was -- you know, there's -- 13 unfortunately, there's a dearth of research with 14 respect to what works and what doesn't. So it's 15 possible I gave them some recommendations regarding, 16 you know, crime prevention meetings, working with 17 the police. I think I recall -- again, this is 15 18 years ago -- so I think I recall giving them 19 information about working with the police not 20 requiring warrants in order to give the guest 21 registry access to the rooms and video surveillance 22 for those hotels that had video surveillance. Not 23 all of them did.</p> <p>24 Q. And I understand we're talking about 25 events 15 years ago and you're doing your best to</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 50..53

Page 50	Page 52
<p>1 recall and I appreciate that.</p> <p>2 Are there any other methods that as you're</p> <p>3 sitting here right now you can recall or have you</p> <p>4 exhausted your memory?</p> <p>5 A. Yeah, I've exhausted my memory, sir. If</p> <p>6 anything else come to mind, I'll let you know.</p> <p>7 Q. Other than the work you did for the City</p> <p>8 of Houston in 2009, what other practical experience,</p> <p>9 to use the language here that you used in</p> <p>10 paragraph 2, do you have mitigating sex trafficking</p> <p>11 at lodging facilities?</p> <p>12 A. Well, so, you know, most of my work is</p> <p>13 consulting. Not litigation. So litigation stuff</p> <p>14 only started a couple years ago with respect to sex</p> <p>15 trafficking specifically. So a lot of my clients</p> <p>16 have hotels on their properties. So when I conduct</p> <p>17 a security risk assessment, these are one of the</p> <p>18 conceptual threats that I look at. In other words,</p> <p>19 you know, what is the risk of your hotel being used</p> <p>20 for prostitution or sex trafficking. So that would</p> <p>21 have been throughout the course of my, you know,</p> <p>22 practice. Most of the work that I've done recently,</p> <p>23 probably the most notable work is in the healthcare</p> <p>24 field. Not so much in the hotels. But with respect</p> <p>25 to hotels, it would just be on an ongoing basis as I</p>	<p>1 A. Well, the stakeholder would be ultimately</p> <p>2 the people that are, you know, responsible for</p> <p>3 managing the place. So the police are not</p> <p>4 necessarily my client. They're not the stakeholders</p> <p>5 as I'm using the term.</p> <p>6 Q. Tell me if I'm misstating or</p> <p>7 misunderstanding. As I understand your testimony a</p> <p>8 moment ago, Mr. Vellani, you're saying that you have</p> <p>9 conducted a number of risk assessments for hotel</p> <p>10 properties that include consideration of the risk of</p> <p>11 sex trafficking or commercial sex activity on the</p> <p>12 property?</p> <p>13 A. Yes, sir. It's -- yes.</p> <p>14 Q. So my next question is, approximately how</p> <p>15 many of those types of risk assessments have you</p> <p>16 performed?</p> <p>17 A. Specifically for hotels?</p> <p>18 Q. Yeah, of that specific type of risk</p> <p>19 assessments for hotels that include consideration of</p> <p>20 sex trafficking risks?</p> <p>21 A. I don't know that I can break it down by</p> <p>22 hotel over the years. But, you know, this is</p> <p>23 something that has -- you know, obviously, working</p> <p>24 with the city was somewhat -- well, it was very</p> <p>25 informative for me that this was a concern. And</p>
Page 51	Page 53
<p>1 evaluate different properties.</p> <p>2 You know, one of the things that I'm</p> <p>3 looking for in hotels or even residential</p> <p>4 environments, you know, because most trafficking</p> <p>5 actually, according to the data, occurs in</p> <p>6 residential environments, not in hotels. So even in</p> <p>7 the apartment complexes that I evaluate, that is</p> <p>8 something I'm looking for, you know, to see if it's</p> <p>9 a concern.</p> <p>10 So when I review the crime history, you</p> <p>11 know, primarily what I'm doing is I'm driving --</p> <p>12 using the crime history of the property and the</p> <p>13 concerns expressed by stakeholders to drive the</p> <p>14 analysis that I'm conducting. So if a hotel is</p> <p>15 telling me that they've got a concern about this,</p> <p>16 then that's one of the issues I'll look at. If they</p> <p>17 tell me they're only concerned about burglaries in</p> <p>18 motor vehicles, that's what I'm looking at. I'm not</p> <p>19 necessarily looking at prostitution or sex</p> <p>20 trafficking.</p> <p>21 But I don't know if I've answered your</p> <p>22 question.</p> <p>23 Q. I think you have. Do you consider the</p> <p>24 police to be stakeholders? Or who counts as a</p> <p>25 stakeholder?</p>	<p>1 then, obviously, understanding what the FBI or what</p> <p>2 the Department of Justice did in 2008 with the</p> <p>3 Wilberforce TVPRA. It has always been an ongoing</p> <p>4 concern for me throughout the years as I conduct</p> <p>5 these assessments. But, you know, every year is a</p> <p>6 little different for me. I mean, some years I'm</p> <p>7 doing more consulting with hospitals. Some years</p> <p>8 I'm doing more consulting with shopping centers,</p> <p>9 retail stores. Some years are more heavy on, you</p> <p>10 know, multi- -- with -- with mixed-use properties</p> <p>11 which include hotels.</p> <p>12 So, you know, is it something I'm working</p> <p>13 on every single year in terms of actual consulting?</p> <p>14 No. Is it something that I'm researching, you know,</p> <p>15 every year? Yes. But I can't tell you, like, the</p> <p>16 number of hotels that I've looked at over the years.</p> <p>17 I mean, in it's been 15 years. You know, I don't</p> <p>18 know the answer.</p> <p>19 Q. Are you able to provide me with an</p> <p>20 approximate range of how many? In other words, is</p> <p>21 it more than 10? Is it more than 25? Is it more</p> <p>22 than 50? Is it more than 100? Can you give me an</p> <p>23 approximate range?</p> <p>24 A. I don't know. I mean, I'd have to go back</p> <p>25 and look at the different projects because a lot of</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 54..57

Page 54	Page 56
<p>1 these projects are for large property owners that 2 own multiple different types of properties within a, 3 you know, single plot of land so to speak. So the 4 ones that's coming to mind, they have a mall. 5 They've got commercial office buildings. They have 6 residential buildings. They have hotels. You know, 7 so I don't know the number. I'd have to go back and 8 think about that.</p> <p>9 Q. Well, because this is the only opportunity 10 I have to depose you in advance of trial, 11 Mr. Vellani, I'm trying to get, as best I can, an 12 understanding of your expertise, experience, 13 education, and so forth.</p> <p>14 A. Yes, sir.</p> <p>15 Q. And I know you understand that because 16 you've been through discovery before.</p> <p>17 Can you tell me, have you conducted more 18 than 10 risk assessments for hotels that include 19 consideration of sex trafficking risks?</p> <p>20 A. Yes, sir. I answered yes. More than 10, 21 yes. Somewhere between 10 and 100. I'd have to go 22 back and look, like I said.</p> <p>23 Q. And is that something that you've done in 24 recent years or is that something that you were 25 doing in 2009 in that period but you've stopped</p>	<p>1 developed programs for identifying and responding to 2 sex trafficking victims in the hospitality 3 environment?</p> <p>4 A. Not specifically in the hospitality. I 5 have researched on hospitality in order to establish 6 a standard of care. I have written and published on 7 healthcare.</p> <p>8 Q. In paragraph 3 towards the bottom, the 9 last sentence of paragraph 3 says that you've worked 10 on projects, and you list different customers or 11 clients, as I understand it, that you've worked on 12 projects with as a consultant. Is that correct?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And you list hotels and motels towards the 15 end.</p> <p>16 A. Yes, sir.</p> <p>17 Q. Have you told me about the projects, to 18 use your language, that you have worked on for 19 hotels and motels? Or are there other projects that 20 we haven't discussed that you're referring to there?</p> <p>21 A. I think we've covered it.</p> <p>22 Q. I was interested that it said you've 23 worked on projects for financial institutions, too. 24 What are those projects?</p> <p>25 A. Banks. Looking at the -- primarily the --</p>
Page 55	Page 57
<p>1 doing?</p> <p>2 A. No. It's been an ongoing thing. I still 3 got clients with those kinds of properties.</p> <p>4 Q. On page 3, looking at the same paragraph 5 of Exhibit 1, it says that you've researched and 6 published on sex trafficking mitigation and 7 developed programs for identifying responding to sex 8 trafficking victims in various environments, notably 9 in the healthcare environment. Do you see that?</p> <p>10 A. Yes, sir.</p> <p>11 Q. There's two footnotes on the bottom of the 12 page and both appear to be references to 13 publications that are for healthcare environments. 14 Is that fair?</p> <p>15 A. Correct.</p> <p>16 Q. Have you researched and published on sex 17 trafficking mitigation and environments other than 18 the healthcare environment?</p> <p>19 A. Researched, yes. Published, those are my 20 only two articles with respect to sex trafficking. 21 One of them addresses -- I think actually both of 22 them may address hotels as well, but they're focused 23 on healthcare.</p> <p>24 Q. Using the language that you're using here 25 in paragraph 2 of Plaintiffs' Exhibit 1, have you</p>	<p>1 so sometime back we had written an article I believe 2 I coauthored with someone else on ATM security. So 3 because of that article I've gotten calls and been 4 retained by banks to evaluate their crime on their 5 property. There's a law in Texas that requires 6 every operator of an ATM to review their crime on an 7 annual basis at the properties. So I've done that. 8 I've also done vulnerability assessments of banks.</p> <p>9 Q. Take a look at page 5 of Exhibit 1 which 10 is the materials received section, Mr. Vellani.</p> <p>11 A. Yes, sir.</p> <p>12 Q. And I take it that all the materials that 13 you received and reviewed are listed here on page 5?</p> <p>14 A. I believe so. I don't think there's any 15 that's come in after this.</p> <p>16 Q. Is that the same for Exhibits 2 and 3, 17 A.G. and G.W.'s reports?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Is it your testimony that you have 20 received and reviewed all of the documents produced 21 in discovery in this case, whether by the plaintiffs 22 or by United Inn or a third party?</p> <p>23 A. Listen, I think all experts are hamstrung 24 by what the attorneys give them and don't give them. 25 So it is my understanding that I have everything.</p>

**G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023**

Pages 58..61

Page 58	Page 60
1 But I don't know that anything was withheld from me.	1 Q. Did you ask to interview hotel staff?
2 Q. I wanted to ask you just a few questions	2 A. I did not. We were five years removed
3 about the materials that you considered that are	3 from the incident. So I did not.
4 listed here on page 5, Mr. Vellani. In the course	4 Q. Do you personally know that hotel staff
5 of your review of materials that you received for	5 working at the hotel in 2017 through 2019 spoke
6 preparation of your reports, Exhibits 1, 2, and 3,	6 English?
7 did you seek background check documentation on	7 MR. ALLUSHI: Objection.
8 United Inn employees?	8 A. I think I had asked Mr. Shareef about
9 A. No, sir.	9 that. And either that -- or the deposition -- it
10 Q. When you work as a consultant with hotels,	10 was either the deposition or during the interview
11 do you recommend that they conduct background checks	11 that I -- that question came up. Whether it was by
12 on the staff that they hire?	12 you or by me. My understanding, or my recollection
13 A. Yes, sir. The short answer is yes.	13 was that, you know, the staff spoke a sufficient
14 Q. Do you consider that to be a security	14 amount of English to get by to do their job.
15 industry standard?	15 BY MR. BOUCHARD:
16 MR. ALLUSHI: Objection.	16 Q. That's your understanding based on what
17 A. To conduct a background check on	17 Mr. Shareef told you?
18 employees? Yes.	18 A. Yes. As I recall, again, whether he told
19 BY MR. BOUCHARD:	19 me or said in a deposition, I don't recall where
20 Q. Why is that?	20 that came up.
21 A. Again, let me be clear about this. I'm	21 Q. Do you know how many people were on staff
22 not aware of any written standard that requires it	22 at the hotel in 2017?
23 unless you adopt such a standard. It's certainly a	23 A. Yeah, he talked about that. I asked
24 good practice to do a background check on your	24 specifically about, you know, the day shift. So on
25 employees or if you're, you know, an apartment	25 page 15 they were five housekeepers, one front desk
Page 59	Page 61
1 complex, your residents. So it's certainly good	1 person, a groundskeeper. So that's seven. And then
2 practices but I'm not aware of any standard which	2 at night there was two, the police officer when the
3 requires it.	3 police officer was there. Otherwise, it was just
4 Q. Why do you recommend to your hospitality	4 the night shift clerk.
5 clients that they conduct background checks on their	5 Q. And you're -- as I understand it, your
6 staff?	6 answer is about how many people were working at a
7 A. Primarily because you're concerned about,	7 given time of day at the hotel. I'm asking do you
8 you know, fiduciary responsibilities, right? I	8 know how many people were on staff generally at the
9 mean, if you got somebody that's got, you know, a	9 hotel in 2017?
10 history of theft of money or credit card fraud and	10 A. Well, I mean, I think that would -- this
11 things like that, you know, you want to try to keep	11 would give us nine plus the owner.
12 those people out of it -- out of the, you know, out	12 Q. Well, do you think that those people were
13 of your employment.	13 working seven days a week?
14 In the situation with respect to	14 MR. ALLUSHI: Objection.
15 trafficking, or prostitution, you know, one of the	15 A. No. What I'm saying is what -- either in
16 concerns would be that they've got a background in	16 the deposition or in the interview, he gave me a
17 vice crimes. So conducting a criminal background	17 list of all the staff members by title and the count
18 check is certainly a good idea.	18 by title. So, no, I don't think they were working
19 Q. Did you -- as part of the materials	19 seven days a week. They might have been. I have no
20 received in preparation for your expert reports, did	20 idea. What I was trying to get from him -- I think
21 you interview hotel staff or review interview notes	21 these came from the interview notes -- was where I
22 of hotel staff interviews?	22 got these numbers from.
23 A. I'm not aware of any hotel staff interview	23 BY MR. BOUCHARD:
24 notes. The only person that I've interviewed in	24 Q. When you say interview notes, are you
25 this case is Mr. Shareef.	25 saying of your interview of Mr. Shareef?

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 62..65

Page 62	Page 64
1 A. Yes, sir.	1 A. So I don't have a specific recollection of
2 Q. Did you personally ask Mr. Shareef	2 any list. I guess it might have shown up in some of
3 questions?	3 the discovery responses. But I don't recall
4 A. Yes, sir.	4 specifically seeing that.
5 Q. And you recorded notes of the interview?	5 Q. So you do not recall seeing lists of who
6 A. I put notes into the report which	6 worked at the hotel, is that correct?
7 ultimately became part of my report.	7 MR. ALLUSHI: Objection.
8 Q. Do you have notes independent of your	8 A. Again, it's possible that a list existed
9 report from the interview?	9 in one of the discovery responses but I don't have a
10 A. No, sir. Everything was incorporated. So	10 specific recollection of the list right now.
11 I had a working document that ultimately turned into	11 Q. Have you -- and I take it the answer is no
12 the report.	12 based on your answer there but tell me if I'm wrong.
13 Q. Okay. So other than the nine people	13 Have you compared lists of staff produced by
14 referenced on page 15 of your expert reports, you're	14 United Inn in discovery in this case?
15 not aware of whether there were any other staff	15 A. Compared it to what?
16 members at United Inn in 2017?	16 Q. To each other, the different lists of
17 A. No, and I should say 10. 10, 10 people	17 hotel staff?
18 including the second police officer. I mean, again,	18 A. Yes, again, I don't have any specific
19 if we're trying to get a total number, I think 10.	19 recollection. So I don't know if there are
20 10 would be about the right number. If we're not	20 different lists or whether there is even a list. I
21 including Mr. Shareef himself who was there	21 don't know.
22 sometimes.	22 Q. When you are working as a security
23 Q. What I would like to do is include	23 consultant with a hotel that's hired you to provide,
24 Mr. Shareef but I would not like to include the	24 for example, a risk assessment, Mr. Vellani, is it
25 police officers who worked off duty. I'm talking	25 important for you to understand who works at the
Page 63	Page 65
1 about hotel staff. Not those who contracted with	1 hotel?
2 the hotel.	2 MR. ALLUSHI: Objection.
3 A. Sure.	3 A. What do you mean by who works, like by
4 Q. How many did you understand, based on your	4 name?
5 interview of Mr. Shareef, were on hotel staff in	5 BY MR. BOUCHARD:
6 2017?	6 Q. Is it important for you to know how many
7 A. So based on your guidance with that	7 people work at the hotel?
8 question, you've got one in terms of the owner.	8 A. Well, some of those people play greater
9 You've got the manager. You've got five	9 importance, right? Like, I'm not really that
10 housekeepers. You've got the front desk person who	10 concerned with the groundskeeper. I'm more
11 may or may not be the same as the owner or manager.	11 concerned about the staff working in the hotel. You
12 And then you got the groundskeepers. So that's	12 know, the staff, the housekeepers, the number of
13 five, six, seven, eight, nine?	13 housekeepers, the number of people working at the
14 Q. And is your understanding that the	14 front desk. But I don't really get bogged down by,
15 staffing was the same in 2018 and 2019?	15 you know, the number of groundskeepers, for example,
16 A. You know, I don't -- I certainly didn't	16 or maintenance people. So yes, I do ask the
17 ask them to break it down by year. So I don't know	17 question. I do have that information but I can't
18 the answer. I think when I asked the question, you	18 think of a place where it actually has a lot of
19 know, we didn't narrow it down for each year. So I	19 relevance like the number of housekeepers or the
20 don't know the answer to that. I don't know if he	20 number of groundskeepers.
21 had the years where he had less staffing or years	21 Q. But the number of housekeepers or the
22 where he had more staff.	22 number of people working at the front desk or in a
23 Q. Have you reviewed lists of who worked at	23 security-related function, is that important to you
24 the hotel from 2017 to 2019 in the course of your	24 in connection with a risk assessment?
25 review of discovery materials in this case?	25 A. It can be. I mean, it depends on the

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 66..69

Page 66	Page 68
<p>1 nature of the engagement. If they're concerned 2 about burglaries of motor vehicles or auto thefts in 3 the parking lot, I'm far less concerned about the 4 staff members in the office. I'm more concerned 5 about the number of people that are engaged in the 6 parking lot. Whether it's a security officer or, 7 you know, front desk staff that's working out into 8 the parking lot. So it depends on the nature of the 9 assessment.</p> <p>10 Q. If you were working for a hotel that asked 11 you to do a risk assessment and as part of that 12 assessment you were considering the risk of sex 13 trafficking, would it concern you if the hotel gave 14 you different lists of staff with different numbers 15 of staff members on it?</p> <p>16 MR. ALLUSHI: Objection.</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q. Go ahead, Mr. Vellani.</p> <p>19 A. I'm sorry. Would it concern me if they 20 gave me different lists? I've not experienced that.</p> <p>21 Q. Okay. So have you ever been in a 22 situation as a consultant advising a hotel on risks 23 related to sex trafficking where you've had 24 difficulty getting information from the hotel about 25 who worked at the hotel?</p>	<p>1 BY MR. BOUCHARD:</p> <p>2 Q. If a hotel had done background checks, you 3 would expect them to maintain records of them?</p> <p>4 A. Yes. It depends on how they're doing it, 5 right? Because they're a lot of portals that are 6 used now. You know, the example I'm thinking of is 7 where they have already got an established criteria 8 set up with the background check company and they 9 simply get a pass or fail and that's sometimes 10 through an online portal. So is it ideal that they 11 would print off a copy of that or somehow save the 12 report and put it in the personnel file, yes. But I 13 certainly have come across circumstances where the 14 criminal background check would be through the 15 portal and they didn't save a record of it. They 16 just have to go back into the portal if they still 17 have access.</p> <p>18 Q. Did you interview Detective Weber?</p> <p>19 A. Did I interview him? I don't think I 20 interviewed the police officers. I don't know. I 21 don't think I did.</p> <p>22 Q. Did you ask to?</p> <p>23 A. No. I think they -- I think, because I 24 got the affidavits, that kind of satisfied my needs.</p> <p>25 Q. Have you seen in the course of your review</p>
Page 67	Page 69
<p>1 MR. ALLUSHI: Objection.</p> <p>2 A. Well, I mean, keep in mind that you're 3 asking me about something that I'm doing in the 4 moment. I don't think I have ever experienced where 5 someone has given me -- having difficulty telling me 6 who is in their employ right now at the time of the 7 assessment because it's in realtime. You know, they 8 may have forgotten someone, I suppose. But -- and 9 they may have clarified later on or when I go 10 on-site, you know, I find an extra staff member 11 there they hadn't mentioned during the telephone 12 interview that occurred before I went on-site. But, 13 you know, we're talking about in the moment when I'm 14 doing a risk assessment. I'm not doing this five 15 years in the past.</p> <p>16 BY MR. BOUCHARD:</p> <p>17 Q. But if the hotel that you were working 18 with had been doing background checks, they should 19 have records of that, you agree, of who they had 20 conducted background checks on in order to gain 21 employment at their hotel?</p> <p>22 MR. ALLUSHI: Objection.</p> <p>23 A. You mean they should have had records of 24 it? Are you asking me if they should have had 25 records?</p>	<p>1 of the discovery materials and materials in this 2 case, have you seen a do not rent list?</p> <p>3 A. I don't know that I've seen one. I mean, 4 I certainly asked about it but I don't know that 5 I've actually seen it. I don't recall seeing it. I 6 don't know if it was, you know, an exhibit to one of 7 the depositions. I don't recall seeing one.</p> <p>8 Q. In the course of your review of discovery 9 materials, did you see nightly security 10 documentation or reports from the hotel security 11 that worked from 10:00 p.m. to 2:00 a.m.?</p> <p>12 A. No, sir.</p> <p>13 Q. Did you see any sign-in/sign-out sheets 14 for trainings of hotel staff?</p> <p>15 A. No, sir.</p> <p>16 Q. Did you see any documents showing which 17 hotel staff received trainings?</p> <p>18 A. No, sir.</p> <p>19 Q. Did you review United Inn's guilty plea to 20 the DeKalb County code enforcement violations?</p> <p>21 A. I'm aware of it. I don't know that I've 22 seen documentation regarding it.</p> <p>23 Q. Did you review a missing person notice 24 relating to Plaintiff J.G.?</p> <p>25 A. Again, I can go back through my file and</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 70..73

Page 70	Page 72
1 see if I've actually seen it. I want to say that I 2 have but I don't recall specifically. 3 MR. BOUCHARD: This is probably a good 4 time to take a break and go off the record. 5 THE VIDEOGRAPHER: Okay. The time on the 6 monitor is 10:54 a.m. and we're off the record. 7 (Recess 10:54 a.m. until 11:14 a.m.) 8 THE VIDEOGRAPHER: The time on the monitor 9 is 11:14 a.m. We are back on the record.	1 A. I don't know, sir. It was after dark. 2 That's all I recall. 3 Q. Was it before midnight? 4 A. I'm sure it was before midnight, yes. 5 Q. Okay. And what was the purpose of going 6 back at night? 7 A. Sometimes I just like to get a feel for an 8 area at night. Not necessarily the property, but 9 the area. 10 Q. You said you're sure it was before 11 midnight. Do you think it was before 9:00 p.m.? 12 A. I couldn't tell you, sir. You know, I 13 couldn't tell you what time it was. 14 Q. Okay. You described what you did when you 15 went at 1:00 p.m. And I wanted to just kind of 16 start there and we'll talk about night and then 17 at -- is there anything else that you did when you 18 went to the property that afternoon around 1:00 p.m. 19 that you haven't told me? 20 A. No, sir. 21 Q. Okay. When you went back at night -- you 22 said you can't remember exactly when you went back 23 but it was before midnight -- what did you do when 24 you went back at night? 25 A. Just get a feel for the area. The traffic
1 night inspection. Can you tell me what that 2 consisted of? 3 A. Yes. So I think the day inspection I went 4 out there at about 1:00 p.m., spent some time at the 5 property. Went and looked around the entirety of 6 the property. Walked it, drove it, looked for 7 concealment opportunities. I think at that point I 8 had known that J.G. said she had sex in a car in the 9 parking lot. So I was looking for concealment 10 opportunities. I was looking at the breezeways 11 where the front door -- I'm sorry -- where the front 12 office was. The number of access points to the 13 property. And then I went and drove the area to get 14 an understanding of, you know, what else was in the 15 area. I may have known about the other hotels in 16 the area. Stone Mountain Inn and that kind of 17 thing. And the gas stations. But, you know, that's 18 kind of my routine is to go look at the area. And 19 then I went back to the hotel that afternoon and 20 then I went back at night to go and just see what it 21 looked like at night. I mean, I didn't go out there 22 and try to look at lighting and try to assume what 23 I'm seeing today or that day was the same I would 24 have seen, you know, back in '17, '18. 25 Q. What time of night did you go back?	1 in the area. You know, look at the lights. The 2 problem with doing the lighting inspection five 3 years later just doesn't make a lot of sense, right? 4 Especially nowadays people doing LED upgrades. What 5 I see in place today is not the same thing I would 6 necessarily see back five years ago because of the 7 LED upgrades that people are typically engaging in 8 nowadays. 9 Q. Is there anything else you did when you 10 went back at night? 11 A. No, sir. 12 Q. Where were you physically positioned when 13 you went back at night? 14 A. Well, I drove the property again. So I 15 drove by the property, drove onto the property. I 16 don't recall sitting there and, you know. I do 17 recall sitting there during the day and just 18 observing the property. You know, from the front 19 parking lot pretty much directly in front of the 20 office. I didn't do that at night. The lighting, 21 you know, the night thing was mostly about the 22 lighting. 23 Q. How long were you on the property in the 24 afternoon when you arrived about 1 o'clock? When 25 did you leave the property?

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 74..77

Page 74	Page 76
<p>1 A. Well, like I said, I was at the property.</p> <p>2 Then I drove the area. Then I went back to the 3 property. So I would say the totality of that was 4 probably a couple of hours.</p> <p>5 Q. Does that mean two hours, approximately, 6 or what does that mean to you?</p> <p>7 A. I don't know. You can look at my invoice 8 and possibly figure it out. I don't --</p> <p>9 Q. What about -- sorry. Go ahead.</p> <p>10 A. I don't know the answer, I guess is the 11 short answer. Well, I've got -- yeah. It was 12 probably at least a couple hours. At night, I don't 13 remember it being very long. Maybe 15 minutes.</p> <p>14 Q. Did you take any notes from your visits to 15 the property that afternoon or that night?</p> <p>16 A. I would have probably taken, like, a keep 17 note like a Google Keep note. I don't know. The 18 short answer is I don't know. If I did, I would 19 have taken them in a Google Keep app and then 20 transferred them to, you know, what ultimately 21 became my report.</p> <p>22 Q. You're saying any notes that you took 23 during your site inspection at the United Inn would 24 be incorporated in your report?</p> <p>25 A. Yes. If I had taken any notes, yes, sir.</p>	<p>1 opportunities for concealment in the parking lot. I 2 looked at the layout of the structure. Like I told 3 you, you know, with that 2009 project, one of the 4 things that stood out was you drive in off a public 5 street and you drive into kind of a motor court and 6 park your car there and go to a registration window. 7 And, you know, so similar to this, I'm just looking 8 for how is this thing laid out, where the cameras 9 are. Opportunities for concealment. Where, you 10 know, light fixture are. Where the front desk is 11 relative to, you know, the entrance. What 12 visibility they have from just the front desk alone. 13 So there was nothing specific. I didn't go look at 14 door locks or anything on the units or anything like 15 that.</p> <p>16 Q. Did you go in any of the rooms?</p> <p>17 A. I did not go in any of the rooms, no.</p> <p>18 Q. Did you go into the office?</p> <p>19 A. I went by the window. I'm not sure if the 20 office was open back then. You know, it was kind 21 of, I guess, the tail end of COVID. Maybe we're 22 still at the tail end. I don't know where we're at. 23 But I did not go into the office. I went to the 24 front desk. I walked the breezeways. I walked the 25 stairs. I walked around to the back. That kind of</p>
Page 75	Page 77
<p>1 Q. Did you take any photos or videos?</p> <p>2 A. I did take photos. I don't think I took 3 any videos. The photos are more -- mostly, like, 4 they're not necessarily security features. They're 5 mostly documentation that I was there.</p> <p>6 Q. And I take it that photos and/or videos 7 that you took are not incorporated in your report?</p> <p>8 A. No, sir.</p> <p>9 Q. How many did you take, do you think?</p> <p>10 A. Probably, like, five or six. Usually the 11 first thing I do is take a picture of some signage 12 indicating where I'm at so when I go back and review 13 the photos, you know, I've got kind of that 14 benchmark.</p> <p>15 Q. Okay. So going back to your reports 16 referenced to "I conducted a day and night 17 inspection of the United Inn and Suites." Have you 18 described for me what that consisted of or are there 19 any other things that you did as part of that 20 inspection that you have not told me about?</p> <p>21 A. No. I gave you kind of the broad brush of 22 what I did that day.</p> <p>23 Q. Well, is there anything specific you 24 haven't mentioned that you did that day?</p> <p>25 A. Well, like I said, I mean, I looked at the</p>	<p>1 thing.</p> <p>2 Q. Fair to say that you tried to walk around 3 the common areas of the hotel?</p> <p>4 A. That would be fair. It's a better way of 5 saying it than what I said.</p> <p>6 Q. And you've told me you can't remember 7 where you stayed that night, is that correct?</p> <p>8 A. Yeah, I don't recall where I stayed. I 9 mean, I typically stay at, you know, I stay -- 10 typically, most of the time I stay at a hotel near 11 the airport. It all depends on where I've got to 12 be, you know, during the course of that trip. You 13 know, so I'll be out there again in a couple weeks 14 and I'm staying at a completely different hotel than 15 where I normally stay. So...</p> <p>16 Q. And I believe you said this. My memory is 17 not perfect so forgive me if I'm repeating myself. 18 Other than the January 17th visit that we've talked 19 about, have you ever visited the United Inn and 20 Suites?</p> <p>21 A. No, sir.</p> <p>22 Q. You also say here on page 6 that on 23 May 25th you interviewed Tahir Shareef to learn more 24 about the security program in place at United Inn 25 and Suites. Do you see that?</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 78..81

Page 78	Page 80
1 A. Yes, sir.	1 Q. During that time period, did United Inn
2 Q. And I believe we've touched on that a bit.	2 have security guards on the property 24 hours a day?
3 And my understanding is, correct me if I'm wrong,	3 A. No, sir.
4 that you did take notes during that interview but	4 Q. During that time period, did United Inn
5 your notes are incorporated into the reports that	5 have security guards on the property outside of
6 you prepared in the three matters, is that correct?	6 10:00 p.m. to 2:00 a.m.?
7 A. Yes, sir.	7 A. No, sir.
8 Q. Where did that interview occur? I take it	8 Q. During that time period --
9 you were not at the United Inn for that interview?	9 A. Well, let me be clear. Let me be clear.
10 A. No. It was by Zoom or Teams or some video	10 I believe the officers in their affidavits stated
11 chat program.	11 they would adjust those times. Either the officers
12 Q. What time of day was it? Do you recall?	12 in their affidavits said that or Mr. Shareef told me
13 A. No.	13 this, that they wouldn't necessarily -- it wasn't
14 Q. Do you recall how long it was?	14 always 10:00 p.m. to 2:00 a.m. It would fluctuate
15 A. It was at least a couple of hours. You	15 based on the needs of the property. If I'm not
16 know, that kind of interview takes at least a couple	16 mistaken, that should be in my reports.
17 of hours.	
18 Q. Who participated?	17 Q. But I take it if Mr. Shareef's testimony
19 A. That is an excellent question. It --	18 or the affidavits differ on that point, you would
20 certainly one or more of the attorneys was on the	19 defer to what the affidavits and Mr. Shareef's
21 call as well. Who it was, it might have been Will	20 testimony say?
22 Story, it may have been Don Brown. Dana may have	21 A. Yes, sir.
23 been on it. I don't recall who was on it	22 Q. During that time period, did United Inn
24 specifically. I was not alone with them, I guess,	23 require security guards to submit daily reports
25 is my point.	24 about their security patrols?
	25 A. So let's be clear here, these are not
Page 79	Page 81
1 Q. What I'm trying to understand is, is the	1 security guards. These are off-duty police
2 entirety of what you learned from Mr. Shareef in	2 officers, just for clarity. The typical things that
3 that interview recorded in Exhibits 1 through 3?	3 off-duty police officers do is different than what
4 A. Yes, sir.	4 security officers do. So the answer to your
5 Q. So in other words, it's not like you're	5 question is no, the police officers did not do
6 going to come into trial and say, well, Mr. Shareef	6 reports on a daily basis like a security officer
7 told me X, Y, Z, it's not in my reports but I	7 would. My understanding is they communicated via
8 remember that he also told me that. Is that fair?	8 phone and text directly with Mr. Shareef about any
9 A. That's fair.	9 issues or the manager that was on duty if there was
10 Q. All right. Okay. And so what you learned	10 an immediate issue.
11 about the security program at the United Inn as	11 Q. Have you reviewed the phone logs and the
12 you've said is incorporated in your report already	12 text logs to determine the frequency of the
13 through that call?	13 communications?
14 A. Yes, sir.	14 A. No, sir.
15 Q. Based on that interview that you had on	15 Q. You said there's a difference between
16 May 25th and your review of certain discovery	16 having security guards and having off-duty cops.
17 materials in the case, Mr. Vellani, I want to ask	17 What did you mean by that?
18 you just some questions about your understanding of	18 A. Number one, I used the term security
19 United Inn's security measures in effect from 2017	19 officer. Not security guard. There are things that
20 to 2019. Okay?	20 are common practices amongst security officers that
21 A. Okay.	21 are different from the way off-duty police officers
22 Q. During that time period and -- again, I'm	22 approach things. Off-duty police officers typically
23 going to be asking about the time period 2017 to	23 are focused on, you know, crime prevention and
24 2019 -- did United Inn have a gate to the property?	24 responding to crimes. They don't typically have
25 A. No, sir.	25 written post orders. Security companies oftentimes

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 82..85

Page 82	Page 84
<p>1 do. You know, security officers will often times 2 have what's called a patrol audit system or a guard 3 tour system. That is not something police officers 4 typically do. So there are differences in the way 5 they approach, you know, whatever the problem is, or 6 whatever their role is. So I wouldn't expect the 7 police officers as a matter of good practice to, you 8 know, do written daily activity reports, for 9 example.</p> <p>10 Q. And your point there about patrol audits 11 actually ties in with a question I was about to ask 12 you. Which is during that time period, did 13 United Inn require or receive patrol audit 14 information from the off-duty police officers who 15 worked from 10:00 p.m. to 2:00 a.m. at the hotel?</p> <p>16 A. Let's make sure we're talking about the 17 same thing. A patrol audit system is basically 18 where you've got sensors all over the property that 19 you scan. Either QR codes, bar codes, something 20 like that. Or you've got some kind of GPS tracking 21 that they use to track where the officers are. I'm 22 not aware of any such system existing in United Inn. 23 It is possible there may have been a system on the 24 police officers' patrol cars that allowed for GPS 25 tracking. It is also possible they had some kind of</p>	<p>1 on their employees? 2 MR. ALLUSHI: Objection. Go ahead. 3 A. So my understanding was that most of his 4 employees were either known to him or came to him by 5 way of referrals from other hotel operators. So 6 from those folks, he told me that they did not 7 conduct criminal background checks. What he told me 8 on the other folks is that he would do criminal 9 background investigations.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q. Your testimony is that he told you that he 12 would conduct background checks on certain of his 13 employees?</p> <p>14 A. On people that were not known to him or 15 directly referred to him by another hotel operator 16 or calling someone from one of the associations.</p> <p>17 Q. But you did not see any proof or 18 documentation of such background checks, is that 19 correct?</p> <p>20 MR. ALLUSHI: Objection.</p> <p>21 A. No, sir, I did not. As I explained, you 22 know, the way background checks are done nowadays, 23 you can either get a formal report from the 24 background check company or you can -- in some 25 instances you can log in to a portal and get access</p>
Page 83	Page 85
<p>1 GPS tracking on their cell phones. But I'm not 2 aware of anything that United Inn required or 3 provided in that regard.</p> <p>4 Q. During that time period, did United Inn 5 have one United Inn employee working at the property 6 from 9:00 p.m. to 6:00 a.m.?</p> <p>7 A. That's my understanding, yes, sir.</p> <p>8 Q. During that time period, did United Inn 9 have one United Inn employee working on the property 10 for five hours during the night without any off-duty 11 police officers also working?</p> <p>12 A. Going to make me do my math. 9:00 to 13 6:00 is what we're talking about. 9:00 p.m. to 14 6:00 a.m. is what we're talking about minus the four 15 hours, right? So six, seven, eight, nine, minus 16 four, that's five hours, yes, sir.</p> <p>17 Q. During the time period, 2017 to 2019, did 18 United Inn conduct a formal assessment, formal 19 risk -- assessment, excuse me, of the property?</p> <p>20 A. My understanding is they only did an 21 informal risk assessment of the property.</p> <p>22 Q. And I think you've answered this, but to 23 be clear, during that time period, based on your 24 interview of Mr. Shareef and your review of the 25 documents, did United Inn conduct background checks</p>	<p>1 to the reports without necessarily printing or 2 saving the report. Or in some cases you can just go 3 into a county website and go do the background check 4 yourself.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. During that time period, did United Inn 7 pay some of their employees in cash and not retain 8 records of the payments?</p> <p>9 A. I don't know the answer to that, sir. I 10 think he testified about that in his deposition. 11 But I don't recall exactly what he said.</p> <p>12 Q. During that time period, did United Inn 13 monitor online reviews about the hotel?</p> <p>14 A. I think he was asked about that as well. 15 I don't think they did. I don't have a specific 16 recollection of it.</p> <p>17 Q. During that time period, did United Inn 18 monitor websites advertising sex for money?</p> <p>19 A. I don't think so.</p> <p>20 Q. During that time period, did United Inn 21 hold regular crime prevention meetings?</p> <p>22 MR. ALLUSHI: Objection. Go ahead, Karim.</p> <p>23 A. I'm going to say no. That's not something 24 that I'm aware of being a practice in the hotel-type 25 facilities. That's something that's a practice</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 86..89

Page 86	Page 88
<p>1 that's typically held in, you know, big corporate 2 type, you know, one of the gas companies, for 3 example, or apartments do it sometimes. But I'm not 4 aware of that being a practice in hotels.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. Mr. Vellani, let's look at page 8 of 7 Plaintiffs' Exhibit 1, which I can represent to you 8 is identical to page 8 in Plaintiffs' Exhibits 2 and 9 3 as well. On page 8 of Plaintiffs' Exhibit 1, 10 there's a paragraph in the middle of the page that 11 starts, "The exploitation phase."</p> <p>12 Do you see that?</p> <p>13 A. Yes, sir.</p> <p>14 Q. What do you mean by exploitation phase?</p> <p>15 A. Well, you have to go back to the previous 16 paragraph that starts on page 7. So it talks about 17 trafficking being a process crime, not a singular 18 offense. So that process phase starts with, you 19 know, either the deception -- I'm sorry -- the first 20 phase of the four distinct phases is deception, 21 abduction or recruitment. You know, in this case I 22 think we've got probably -- we don't have abduction. 23 You know, I think I can either characterize these 24 three incidents as either starting with deception or 25 recruitment. A.G. and G.W. may be a little</p>	<p>1 locations. So I don't know if I answered your 2 question, but I hope I did.</p> <p>3 Q. Well, help me out with that paragraph 4 where you say the exploitation phase occurs in 5 different types of places. Are you talking there 6 generally about human trafficking or are you talking 7 about sex trafficking?</p> <p>8 A. Human trafficking consists of two 9 different forms of trafficking. It consist of labor 10 trafficking and sex trafficking or sex trafficking. 11 So because we're talking about sex trafficking here, 12 we can talk specifically about how that occurs with 13 respect to sex trafficking.</p> <p>14 So the exploitation phase usually involves 15 the moving the victims around to different 16 locations. In other words, you're not just 17 hunkering down at one hotel and everything is 18 occurring there. You're usually moving around to 19 different places. You can also be moved in the 20 strip clubs. You can be moved into the massage 21 parlors, you can be moved into residential 22 environments which I think I mentioned to you is the 23 most common location is a personal residence. Not 24 in a hotel.</p> <p>25 Q. Is this paragraph saying -- or is it your</p>
<p>1 different on that one. I guess recruitment would be 2 the right word.</p> <p>3 And then transportation. So I think 4 they -- at least with A.G. and G.W., I believe they 5 transported themselves to the hotel, if I recall 6 correctly. And then you have that exploitation 7 phase which is usually where the incident occurs. 8 Where the actual, you know, the actual sexual part 9 of the incident occurs. Keep in mind we're talking 10 about human trafficking here. We're not necessarily 11 talking about sex trafficking with these four 12 phases. So the exploitation can also be labor 13 trafficking.</p> <p>14 And then you have the fourth phase which 15 is victim disposal.</p> <p>16 So what I'm talking about with respect to 17 the exploitation phase, it can occur and often 18 occurs in different locations. If you're 19 trafficking for labor, sometimes it may be only in 20 one location, like, you know, basically you got a 21 domestic slave for lack of a better word. That may 22 only happen in one location.</p> <p>23 With sex trafficking, it's typically a 24 transient crime where it's moving around from place 25 to place, hotel to hotel, you know, residential</p>	<p>1 opinion that the exploitation phase as it relates to 2 sex trafficking specifically can occur in public 3 places?</p> <p>4 A. Yes.</p> <p>5 Q. How so?</p> <p>6 A. Well, if you've got somebody that's forced 7 into commercial sex acts and are told to, for 8 example, walk the street to solicit customers, the 9 trafficking -- the actual exploitation can occur in 10 a back alley, for example. It can occur in a car on 11 the side of the street. It can occur in a public 12 park, for example. So there are numerous places 13 where the exploitation can occur.</p> <p>14 Q. Can exploitation as it relates to sex 15 trafficking exploitation occur in hotel common 16 areas?</p> <p>17 A. Yes.</p> <p>18 Q. How so?</p> <p>19 A. Well, again, I think in J.G.'s case she 20 mentioned having sex in a car in the parking lots. 21 So that would be in the common area. The parking 22 lot would be the common area.</p> <p>23 Q. And to make sure that we're speaking the 24 same language here, when we talk about hotel common 25 areas, we're talking about parking lots, hallways,</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 90..93

Page 90	Page 92
<p>1 stairwells, breezeways, sidewalks that are on the 2 property. Do you agree with that? 3 A. Yes, or in the bushes. 4 Q. Any other ways you can think of that the 5 exploitation phase as it relates to sex trafficking 6 can occur in a hotel common area? 7 A. Yes, rooftop pools, or rooftops, period. 8 Accessible rooftops. 9 Q. Do you consider online ads a public place? 10 MS. RICHENS: Objection. 11 A. I would consider them to be a public 12 place. But I think the online ads are typically for 13 advertising of the exploitation. 14 BY MR. BOUCHARD: 15 Q. The next paragraph, Mr. Vellani, on page 8 16 talks about sex trafficking being a transient 17 clandestine crime, which I think you mentioned a few 18 moments ago. Do you see where I'm referring? 19 A. Yes, sir. 20 Q. And you say "unlike robbery which often 21 occurs in the open with victims willing to report 22 the crime, the clandestine nature of the 23 exploitation phase of sex trafficking makes it 24 difficult to protect and prevent." Do you see that? 25 A. Yes, sir.</p>	<p>1 two other parked cars or between a parked car and 2 another structural barrier and you would still, you 3 know, have concealment. That way and because of 4 that, it would be difficult to detect and prevent. 5 We're not talking about necessarily acts that are 6 lasting all night long. So it could be something 7 that happens very quickly in a parking lot. But 8 she's the only one that factually stated that there 9 was something going on outside. 10 BY MR. BOUCHARD: 11 Q. Have you reviewed as part of your review 12 of certain discovery materials text messages between 13 A.G. or G.W. and their traffickers? 14 A. You know, I'd have to go back and look at 15 their exhibits. That all sounds familiar. Give me 16 one second. If I'm not mistaken, that stuff was in 17 their -- in the deposition exhibits. There's a lot 18 of files here. So just give me one minute. 19 Q. I can represent to you, Mr. Vellani, there 20 were certain text messages used in A.G. and G.W.'s 21 depositions. It wasn't the full scope of them. So 22 are you familiar with the text messages that were 23 used as exhibits in their depositions, but if there 24 were -- 25 MR. ALLUSHI: Objection.</p>
Page 91	Page 93
<p>1 Q. Is that your opinion about sex trafficking 2 in general or is that your opinion about the sex 3 trafficking allegations in these three cases? 4 A. Well, probably both. Because I'm only 5 aware of one of the -- I'm only aware of J.G. who 6 claims that on United property she had sex in the 7 common areas. My understanding of all the rest of 8 the incidents they were inside the guest room where 9 it would be difficult to understand what's happening 10 inside the guestroom, you know, without installing 11 cameras or something in a guest room which would be 12 ludicrous, obviously. 13 Q. So do you make a distinction between 14 J.G.'s allegations and A.G. or G.W.'s allegations 15 because of what you just noted, or do you still say 16 in all three cases that sex trafficking is a 17 transient and clandestine crime that is difficult to 18 detect and prevent? 19 MR. ALLUSHI: Objection. 20 A. So I would still hold the same opinion on 21 all three cases. All I'm pointing out factually is 22 that J.G. stated she had sex in the parking lot. 23 The problem with that is you still have -- you know, 24 that would be a concealment opportunity, right? 25 Because, I mean, you could have sex in a car between</p>	<p>1 BY MR. BOUCHARD: 2 Q. -- you're not familiar with them? 3 MR. ALLUSHI: I'm going to object. If you 4 need to review the record before you answer 5 that, you can do so, Karim. 6 THE WITNESS: Yeah. Thank you. 7 A. I'm looking at some of the text messages 8 now. So, yes, I do see this. In a Number A.G. 9, 9 for example. 10 BY MR. BOUCHARD: 11 Q. Are you familiar with text messages 12 outside of those that were used as exhibits in A.G. 13 and G.W.'s depositions? 14 A. Unless they were part of my file, I don't 15 have a specific recollection of others. There may 16 have been but I don't know. 17 Q. Is it your opinion, Mr. Vellani, that sex 18 trafficking of minors in hotels is always difficult 19 to detect and prevent? 20 A. Always? No. I mean, I think what's 21 difficult is to know what's going on inside a room. 22 Q. Why is that difficult? 23 A. Because the guest room is a private space. 24 You know, you're ultimately, you know, renting the 25 room with a certain expectation of privacy. So, you</p>

**G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023**

Pages 94..97

Page 94	Page 95	Page 97
<p>1 know, you don't have staff that just comes in and 2 unlocks the door and walks in. You may have staff 3 that comes in upon request or at the guest's 4 request. But you very rarely will see the hotel 5 just going and unlock a door except by police 6 request.</p> <p>7 Q. Are you not familiar with routine 8 housekeeping services whereby hotel staff would 9 regularly come into and out of rooms for cleaning 10 purposes?</p> <p>11 A. Yes, that's what I meant. That's either 12 at staff request because the housekeepers want to 13 get in and clean or somebody wants to do an 14 inspection or in the case of United Inn they had a 15 policy to inspect a room every seven days. Or at a 16 guest request where they request housekeeping or 17 maintenance or something like that. So I did 18 mention that.</p> <p>19 Q. When you talk about that United Inn 20 policy, are you familiar with the DeKalb County 21 motel/hotel ordinance in effect in 2017?</p> <p>22 A. Yes.</p> <p>23 MR. ALLUSHI: Objection.</p> <p>24 MS. RICHENS: Yeah, objection.</p> <p>25 A. I am familiar with it, yeah, I've actually</p>	<p>1 well. You know, that might give you some impetus to 2 go and knock on the door and find out what's going 3 on. We're not there yet for facial recognition 4 cameras for sure. But I think we'll get there at 5 some point. That would be a circumstance where I 6 think it might be easier to detect. Barring 7 something -- some, you know, technological 8 advancement and a reduction in the cost of such 9 technology, you know, I think it's -- it's 10 challenging. If you were to go stand outside and 11 just monitor, you know, every room, you know, have 12 visibility to every room and sat there and count the 13 number of unique people entering in over the course 14 of an hour, that might be an indicator. But barring 15 something like that, I don't know from an 16 operational practice perspective, what would work 17 today. Like, I think I have an understanding what's 18 going to work in the future. Less so what is going 19 to happen -- you know, what would work today.</p> <p>20 Q. I'm going to show you what I'm marking as 21 Plaintiffs' Exhibit 4. I'm going to do a screen 22 share here, Mr. Vellani.</p> <p>23 (Thereupon, marked as Plaintiff 24 Exhibit 4.)</p>	<p>1 BY MR. BOUCHARD:</p> <p>2 Q. And Plaintiffs' Exhibit 4 is an email and 3 an attachment to it. Do you see that Plaintiffs' 4 Exhibit 4 is Bates-stamped NEBI003097 which I can 5 represent to you is a document produced by 6 United Inn?</p> <p>7 A. Yes, sir.</p> <p>8 Q. It's an email from investigator T. Wade 9 whose signature block identifies him as being with 10 the Rockdale County Sheriff's Office?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Do you see the subject line says "missing 13 person"?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And it says, "Ashar, was advised by her 16 guardian that she was staying at United Inn located 17 at 4649 Memorial Drive. Thank you for your help."</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Are you familiar with this email?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And you see there's an attachment to it, 23 that says bolo [J.G.]?</p> <p>24 A. Yes, sir.</p> <p>25 Q. You understand [J.G.] is Plaintiff J.G.?</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 98..101

Page 98	Page 100
1 A. Yes, sir.	1 front desk. Same thing with DNRs, do not rent list,
2 Q. What's a bolo?	2 trespass list, all these kind of things would be
3 A. Be on the lookout.	3 typically posted in the office, typically in the
4 Q. Are you familiar with be on the lookout	4 private area. You know, not in the common area.
5 notices?	5 So, no, I'm not aware of anywhere they would see
6 A. Yes, sir.	6 this without going into the office.
7 Q. Okay. And this is the attachment to, and	7 Q. Do you know if each of the members of the
8 you can see, it's the next consecutive Bates number	8 housekeeping staff saw a copy of this notice?
9 of 003098 in that email. Have you seen this	9 A. I can't say specifically with respect to
10 document before? That is the bolo missing person	10 this notice, sir.
11 report for [J.G.]?	11 Q. Anything else that you think in your
12 A. Yes, sir.	12 opinion the hotel should have done in response to
13 Q. Do you understand that the hotel received	13 receipt of this notice?
14 this email and the corresponding notice?	14 A. Well, again, everybody's got different
15 A. Yes.	15 ways of communicating, right? I mean, every
16 Q. And do you understand that the email that	16 organization communicates in different ways. So in
17 we were just looking at was dated October 29th? Do	17 this situation, the way he -- the way Mr. Shareef
18 you agree? I can go back to it.	18 shared information was by posting it in the office.
19 A. Yes, sir.	19 I mean, I've seen other organizations which would be
20 Q. And the notice here is dated October 9th.	20 an email blast if everybody had email or a text
21 It says that she's been missing since October 9th.	21 blast or a Slack chat or something like that. So,
22 Do you see that?	22 you know, as long as they're communicating it
23 A. I think I saw it on the other page.	23 somehow, I'm comfortable with that. The mechanism
24 Q. Yes, sir.	24 by which they communicate would be up to the
25 A. Yes.	25 individual culture or the organization that we're
Page 99	Page 101
1 Q. In your opinion as somebody who works in	1 dealing with.
2 the security industry and has provided	2 Q. When a hotel receives a notice like this
3 recommendations to hotels about mitigating the risk	3 that specifically says there's a missing 16-year-old
4 of sex trafficking, what do you think United Inn and	4 who is suspected of being at that particular hotel,
5 Suites should have done in response to receiving	5 would you recommend to the hotel that they convene a
6 this notice?	6 staff meeting to ask staff whether they had seen the
7 MS. RICHENS: Objection.	7 missing minor identified in the missing minor
8 A. Well --	8 notice?
9 MR. ALLUSHI: Objection.	9 MS. RICHENS: Objection.
10 A. -- somehow shared it with the staff. And	10 A. It's a lovely idea. But I don't know
11 my understanding from either the deposition or my	11 that -- you know, I don't know the frequency at
12 interview with Mr. Shareef is they posted these	12 which they deal with this kind of issue. You know,
13 missing persons flyers in the office so the staff	13 if it was a unique one-off circumstance, you know,
14 could see them.	14 perhaps. If this was, like, an ongoing thing where
15 BY MR. BOUCHARD:	15 the police were leaving missing persons flyers, you
16 Q. Do you know if the staff had an	16 know, I can't imagine that you would have a meeting
17 opportunity to see this notice outside of walking	17 every time something like this happened.
18 into the office?	18 So I think it was reasonable to post this
19 A. I don't know where else they could post	19 in the office for the staff to be able to see it.
20 it. You know, it would have to go in the office. I	20 You know, I also wouldn't recommend that somebody go
21 mean, that whole kind of, you know, trespassing	21 door to door looking for her. So, again, I'm
22 list, do not rent list, missing person list, all of	22 comfortable with what they did which is to post it
23 that, you know, bad check list, you know, thinking	23 in the office.
24 about the way a bodega is run in New York City.	24 Let me know when we get to a two-minute
25 They have the list of bad check writers right at the	25 stopping point. I apologize. I didn't take a

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 102..105**

Page 102	Page 104
1 restroom break. 2 BY MR. BOUCHARD: 3 Q. Let me just ask a couple more questions. 4 I won't take long. 5 A. Sure. 6 Q. Is a hotel's receipt of missing minor 7 notices like this relevant to your assessment of the 8 risk of sex trafficking at a hotel? 9 MR. ALLUSHI: Objection. 10 MS. RICHENS: Objection. 11 A. Well, it's a missing -- I mean, based on 12 what I'm looking at up on the screen, it's a missing 13 person. It's not a notice of sex trafficking. 14 Now, I think if you go back to the email 15 for one second, I think he did reference that, if 16 I'm not mistaken. 17 Okay, so that even references it there. I 18 mean, you know, no, it wouldn't -- I don't see the 19 connection from a missing person to -- unless I'm 20 not seeing something on the screen. I'm not seeing 21 the connection to sex trafficking. I'm simply 22 seeing a missing person flyer. 23 BY MR. BOUCHARD: 24 Q. So an unaccompanied missing 16-year-old 25 law enforcement notice regarding an unaccompanied	1 monitor is 11:58 a.m. And we are off the 2 record. 3 (Lunch recess 11:58 a.m. until 12:48 p.m.) 4 THE VIDEOGRAPHER: The time on the monitor 5 is 12:48 p.m. and we are back on the record. 6 BY MR. BOUCHARD: 7 Q. Good afternoon, Mr. Vellani. Did you have 8 a good lunch? 9 A. Yes. Thank you. 10 Q. Thank you. We were -- before we took the 11 break, we were talking about Plaintiffs' Exhibit 4 12 which was a notice regarding Plaintiff J.G. Do you 13 remember Plaintiffs' Exhibit 4? 14 A. Yes, sir. 15 Q. And I wanted to ask you, sir, whether in 16 your opinion is the number of missing minor notices 17 that a hotel receives about minors suspected of 18 being at the hotel relevant to the risk of sex 19 trafficking at the hotel? 20 MS. RICHENS: Objection. 21 A. The answer is no, because I'm not certain 22 of what the correlation is between missing persons 23 and sex trafficking. A lot of missing persons are 24 simply just runaways. 25
Page 103	Page 105
1 minor being at the hotel for weeks, is not relevant 2 in your opinion to a hotel's assessment of the risk 3 of sex trafficking at the hotel? 4 MS. RICHENS: Objection. 5 A. Again, I'm not -- I'm not -- perhaps I'm 6 not following your question. But I'm not seeing the 7 connection between a missing person and sex 8 trafficking. 9 BY MR. BOUCHARD: 10 Q. Well, I'm not talking specifically about 11 just a missing person report. I'm talking about a 12 missing 16-year-old report that specifically regards 13 that 16-year-old being at the property for weeks on 14 end when it's the middle of the school year. 15 MS. RICHENS: Objection. 16 A. I -- 17 MR. ALLUSHI: Objection. 18 A. I would look at that as a concern for a 19 missing person. I wouldn't correlate that with sex 20 trafficking. 21 MR. BOUCHARD: Okay. This is a good time 22 for us to take a break if it's a quick one. Or 23 if we need a long one. We can go off the 24 record here. 25 THE VIDEOGRAPHER: Okay. The time on the	1 BY MR. BOUCHARD: 2 Q. And, sir, are you not aware of a 3 correlation between runaway minors and sex 4 trafficking? 5 A. Well, if you look at the number of -- if 6 you look at the FBI's Uniform Crime Report which 7 documents runaways, you're talking about, you know, 8 tens if not hundreds of thousands of incidents on an 9 annual basis. And you look at the number of sex 10 trafficking incidents and you're talking about, you 11 know, hundreds of incidents. So I'm not sure where 12 that correlation would be. 13 Q. Is your testimony that the prevalence of 14 sex trafficking nationwide is hundreds of incidents 15 per year? 16 A. So -- 17 MR. ALLUSHI: Objection. 18 A. -- I'm talking about the number of sex 19 trafficking incidents -- I think we'll have to 20 acknowledge the obvious, which is nobody's got great 21 number on this issue. You know, we don't have -- 22 nobody collects statistics that have been found to be 23 reliable. I think the FBI data is probably 24 underreported and the national trafficking hotline 25 is probably overreported. I don't think we've got a

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 106..109

Page 106	Page 108
<p>1 great handle on this. Having said that, you know, 2 the prevalence data is just not any kind of a -- 3 it's not in a reliable place right now. But if you 4 look at the FBI stats -- forgive me, I'm trying to 5 pull it up. And I'm happy to share this with you 6 since I did not provide this previously. I'm only 7 looking this up in response to the question you're 8 asking me.</p> <p>9 BY MR. BOUCHARD:</p> <p>10 Q. Sir, Mr. Vellani, I'm going to ask you, 11 don't conduct internet searches --</p> <p>12 A. I'm not.</p> <p>13 Q. -- to try to answer --</p> <p>14 A. I'm not.</p> <p>15 Q. -- my question.</p> <p>16 A. I'm not. I'm looking at the FBI files 17 that I actually have on my computer. And like I 18 said, this was a file that I'm happy to provide you. 19 You know, I did give you the DeKalb County incident. 20 But if you look at 2022, for example, you know, they 21 were not -- there's barely -- I don't have a total 22 here, but there's barely a thousand incidents versus 23 the tens of thousands or hundreds of thousands of 24 calls the National Trafficking Hotline receives. 25 The number is 2135, by the way, nationwide, in 2022.</p>	<p>1 United Inn and Suites is a healthcare setting, is 2 that correct?</p> <p>3 A. No, sir. The purpose of this section was 4 to illustrate the challenges in identifying victims 5 in an environment where you're able to ask a lot of 6 invasive questions and conduct physical examinations 7 and also separate the victim from the trafficker. 8 That was the purpose of this section. These are not 9 things that a hotel can reasonably do.</p> <p>10 Q. Your first paragraph cites to four 11 different footnotes, 10, 11, 12, 13, looking at 12 page 9 of your first paragraph?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Do you agree that those four footnotes 15 pertain to sex trafficking identification in the 16 healthcare setting?</p> <p>17 A. Yes, sir. Well, yes. 11 and 12 I know 18 specifically address hotels as well and the 19 challenges of identifying victims in other 20 environments other than healthcare.</p> <p>21 Q. So your opinion in that first paragraph as 22 I am going to read it is, "Without self-reporting, 23 sex trafficking victims are difficult to identify 24 and are frequently misidentified."</p> <p>25 Do you see that?</p>
<p style="text-align: center;">Page 107</p> <p>1 You know, that's not a lot of data. If you go back 2 to 2019, you know, we can look at those numbers and 3 I can assure you I'm not doing it right now, but I 4 can assure you it's going to be far less.</p> <p>5 Q. And my specific question was whether you 6 were aware of the relationship between runaway 7 minors and sex trafficking risks.</p> <p>8 Are you aware of the relationship or not 9 aware?</p> <p>10 A. I'm aware of a relationship between 11 vulnerable populations of which runaways would be 12 part of that vulnerable population. So -- but as 13 far as a direct correlation between missing minors 14 and sex trafficking, no, I'm not aware of the 15 correlation.</p> <p>16 Q. If we can take a look at page 9 of 17 Plaintiffs' Exhibit 1. It's the J.G. report. 18 Page 9 is identical in Exhibits 2 and 3 as well. 19 Let me know when you're there, sir.</p> <p>20 A. Yes, sir. I'm there.</p> <p>21 Q. Do you agree, sir, that pages 9 through 11 22 of your report concern identifying sex trafficking 23 victims in the healthcare setting?</p> <p>24 A. Yes, sir.</p> <p>25 Q. And you're not of the opinion that the</p>	<p style="text-align: center;">Page 109</p> <p>1 A. Yes, sir.</p> <p>2 Q. Focusing on the hospitality setting in the 3 hospitality environment. Is it your opinion that 4 unless minor victims of sex trafficking self-report, 5 they are difficult to identify in a hospitality 6 setting?</p> <p>7 A. Yes.</p> <p>8 Q. What is your basis for that opinion?</p> <p>9 A. So, again, it's easier to think about 10 this -- I hope it's easier to think about this if 11 you look at the challenges in environments where 12 it's easier to identify them. Challenging but still 13 easier, okay? So we have difficulties in 14 identifying victims in environments where 15 theoretically it's easier to identify them. So 16 anything short of those environments makes it 17 significantly harder. So that's kind of the basis 18 for it. The other thing is when I think about how 19 to solve this problem, and that's what I do, I mean, 20 that's what I do for a living is try to solve crime 21 problems. I look at all the various solutions to 22 try and solve a crime problem and there's very few 23 things that are in existence today, either 24 technology-wise or, you know, are reasonable to 25 deploy that could be, you know, used to, you know,</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 110..113

Page 110	Page 112
<p>1 determine whether something bad is going on, right?</p> <p>2 I mean, all you can do is provide all the things</p> <p>3 that you can provide, like phones, for example, in</p> <p>4 rooms or making staff available so people can</p> <p>5 self-report. I don't know if I answered your</p> <p>6 question. I hope I did.</p> <p>7 Q. Do you think that the act of sex</p> <p>8 trafficking minors is as likely to happen in a</p> <p>9 healthcare environment as it is in a hospitality</p> <p>10 environment?</p> <p>11 A. Okay. So we have to go back to the</p> <p>12 process notion, right? It's not -- sex trafficking</p> <p>13 is not an act, okay? The sex, the exploitation, the</p> <p>14 sex is an act but there's a whole process involved</p> <p>15 with this. So do I think that the exploitation, the</p> <p>16 abduction, as the case may be in some instances, not</p> <p>17 our instances, but in other instances that can occur</p> <p>18 elsewhere besides at a hotel.</p> <p>19 Q. And I appreciate the clarification and</p> <p>20 understand the point. Let me clarify my question</p> <p>21 and say, do you agree that it's more likely that the</p> <p>22 exploitation phase of sex trafficking will occur in</p> <p>23 a hospitality environment than in a healthcare</p> <p>24 environment?</p> <p>25 A. Not the exploitation. If you go within</p>	<p>1 Q. Is it your opinion that signage can</p> <p>2 encourage victims of sex trafficking to report their</p> <p>3 victimization, whether it's verbal reporting or</p> <p>4 nonverbal reporting?</p> <p>5 MR. ALLUSHI: Objection.</p> <p>6 A. So the signage here is basically very</p> <p>7 explicit instructions on how to report that you need</p> <p>8 help. So, for example, it's not just a sign like</p> <p>9 the one that's, you know, in OGCA that requires just</p> <p>10 the National Trafficking Hotline. This is very</p> <p>11 explicit signage that says flip over this sign to</p> <p>12 let us know you need help. Or, you know, put this</p> <p>13 colored sticker on the urine cup so we know you're</p> <p>14 trying to tell us something. Right? It's very</p> <p>15 explicit signage. But it's also signage that comes</p> <p>16 on the heels of this very invasive questioning that</p> <p>17 medical providers can ask that hotel folks cannot</p> <p>18 ask or shouldn't ask. You know, so it's -- it's if</p> <p>19 they have -- what I'm laying out here is how we do</p> <p>20 it in healthcare. It is basically a start to finish</p> <p>21 process that involves all steps. Not just some.</p> <p>22 BY MR. BOUCHARD:</p> <p>23 Q. Understood. And I want to go back to the</p> <p>24 question and just understand. Do you believe that</p> <p>25 signage can encourage victims of sex trafficking to</p>
<p>1 the umbrella of the exploitation, there are many</p> <p>2 acts involved. Okay. This is the reason why they</p> <p>3 have, for example, I don't know about other states,</p> <p>4 but here in Texas, if you go get a haircut, you're</p> <p>5 going to see the sex trafficking sign. Okay?</p> <p>6 Because the exploitation can occur at the barbershop</p> <p>7 as well. So exploitation is a broader concept than</p> <p>8 just a sex act. I do agree with you that the sex</p> <p>9 act is most likely to occur in a private space.</p> <p>10 Whether that's a personal residence, a car that's</p> <p>11 concealed, you know, a park where there's nobody at</p> <p>12 or in a guest room of a hotel.</p> <p>13 Q. As opposed to a healthcare environment?</p> <p>14 A. Yeah. God, I hope not, but, yeah, I</p> <p>15 guess.</p> <p>16 Q. I want to look at page 12. You say in the</p> <p>17 middle paragraph, you start by saying, "Healthcare</p> <p>18 facilities can also implement methods to encourage</p> <p>19 victims to give nonverbal signals."</p> <p>20 Are you familiar with this paragraph?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And part of -- at least part of what you</p> <p>23 discuss in this paragraph, if you agree with me,</p> <p>24 sir, relates to signage. Do you agree with me?</p> <p>25 A. Yes, sir.</p>	<p>1 report their victimization?</p> <p>2 A. Okay. But -- yes, yes. But based on the</p> <p>3 way the sign is that I'm referring to here which is</p> <p>4 very explicit, right? A sign that says, you know,</p> <p>5 flip this sign over -- number one, you're creating</p> <p>6 this trustworthy, safe space followed by separation</p> <p>7 of the trafficking victim from the trafficker,</p> <p>8 followed by this very thorough medical examination</p> <p>9 followed by these invasive questions culminating in,</p> <p>10 hey, we need to get a urine sample. Go to this</p> <p>11 private bathroom which is only accessible to</p> <p>12 patients and then you'll find this very explicit</p> <p>13 sign with instructions on it. This is not the same</p> <p>14 thing as throwing up a sign in a hotel lobby.</p> <p>15 That's all I'm trying to illustrate.</p> <p>16 Q. Just underneath that paragraph still</p> <p>17 looking at page 12 of Plaintiffs' Exhibit 1, there's</p> <p>18 a paragraph that begins, "I am unaware of any</p> <p>19 evidence-based research."</p> <p>20 Do you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And you're familiar with that paragraph,</p> <p>23 sir?</p> <p>24 A. Yes, sir.</p> <p>25 Q. What is the definition, or what is your</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 114..117

Page 114	Page 116
<p>1 definition of evidence-based research?</p> <p>2 A. So glad you asked me that question. I 3 just did a great presentation on this. I think it 4 was a great presentation for the -- for the American 5 Society for Industrial Security. And I would rather 6 just read it to you if you don't mind, because I 7 think this is an important part of this.</p> <p>8 Q. Well, sir, every witness --</p> <p>9 MR. ALLUSHI: Let him. Hang on, David, 10 let him finish.</p> <p>11 MR. BOUCHARD: Well, he was starting to 12 pull it up, I believe, and I was just going to 13 ask him not to do that.</p> <p>14 A. Well, I explore the benefit of not having 15 to try and memorize this. Basically evidence-based 16 is an approach. It started in medicine. It has in 17 essence expanded into law enforcement education and 18 the security industry that emphasizes the practical 19 application of findings based on the best available 20 current research.</p> <p>21 So in the security industry we talk about 22 a systematic approach to reviewing evidence, 23 criminology evidence in our case, or 24 security-related research in our case to identify 25 those best practices that work. And ultimately what</p>	<p>1 control trials, right? We're looking for more than 2 a bunch of yahoos sitting in a room making up 3 indicators and saying, yeah, these are indicators of 4 sex trafficking. Because that is not evidence 5 based, and to your point, that's not peer-reviewed.</p> <p>6 Q. Okay. So did you just give me the full 7 evidence hierarchy as you're calling it or is there 8 more to that hierarchy?</p> <p>9 A. No, there's more to it. Do you want me to 10 pull that up?</p> <p>11 Q. So just as a general rule I don't want you 12 to be pulling up documents.</p> <p>13 A. Okay.</p> <p>14 Q. Referring to files or anything else unless 15 I'm asking you or referring you to the document. 16 Because if we were sitting here in person, 17 Mr. Vellani, obviously, you wouldn't have the 18 ability to do that. And it's not the typical or 19 accepted practice in depositions for witnesses to 20 just be referring to their own documents.</p> <p>21 So I'm asking as you're sitting here and 22 as you recall, is there more to that evidence 23 hierarchy that you can tell me about?</p> <p>24 A. Yes. As I recall, so like I said, 25 systematic reviews are considered a level 5.</p>
<p>1 we're trying to do is find out what works, what 2 doesn't and what is -- (Zoom distortion).</p> <p>3 THE STENOGRAPHER: Your audio cut out 4 there, sir. "What doesn't and what is..."</p> <p>5 A. What works, what doesn't and what is 6 promising.</p> <p>7 THE STENOGRAPHER: Thank you.</p> <p>8 BY MR. BOUCHARD:</p> <p>9 Q. And so what needs to serve as the basis 10 for the evidence-based research? Is it 11 peer-reviewed studies? Is it randomized controlled 12 trials what constitutes, quote/unquote, evidence?</p> <p>13 A. Sure, that's a great question. So there's 14 something called the evidence hierarchy. And at the 15 top of the evidence hierarchy are systematic 16 reviews. A systematic review is basically a 17 summary, a synthesis of all prior research that's 18 been done on a certain topic. Typically, those 19 prior studies are going to be randomized control 20 trials. So where systematic reviews exist, that's 21 what we're looking for. Systematic reviews are 22 pretty rare in my field. They do exist in some 23 areas like lighting and video surveillance, things 24 like that.</p> <p>25 Barring that, we're looking for randomized</p>	<p>1 Randomized control trials are also considered a 2 level 5. Other studies like pretest/post-test, 3 meaning what's the crime before we implement 4 measures? What's the crime after we implement 5 measures? Those are typically, if I recall, like a 6 level 3 or 4. Below that is survey research. Below 7 that is, you know, like case studies, like corporate 8 case studies and just opinions.</p> <p>9 Q. So would those be levels 1 and 2?</p> <p>10 A. I think, believe it or not, I actually 11 think it starts at level 0. I think it goes from 12 level 0 to 5.</p> <p>13 Q. Is it your opinion, Mr. Vellani, that 14 anti-trafficking intervention should not be used at 15 hotels unless there's evidence-based research 16 showing they are effective?</p> <p>17 MR. ALLUSHI: Objection.</p> <p>18 A. I wouldn't say that. What I would say is 19 that, you know, there are some organizations that 20 will implement things that they have seen work at 21 other locations. And they can try and see if it 22 will work at, you know, a potential other location. 23 In which case they've got anecdotal information, 24 anecdotal evidence that something works. So it 25 doesn't have to be only, you know, evidence-based</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 118..121**

Page 118	Page 120
<p>1 research. We can still try things that work in one 2 location and see if it works in another location. 3 That's, obviously, not always the case but, you 4 know, ideally it would work at another location. 5 But there's no way to know until you try it.</p> <p>6 Q. I take it based on that answer that your 7 answer here will be no, but let me know if I'm 8 wrong. Is it your opinion that anti-trafficking 9 interventions cannot be effective at hotels unless 10 there's evidence-based research of their 11 effectiveness?</p> <p>12 MR. ALLUSHI: Objection.</p> <p>13 A. Well, again, it's hard for me to answer on 14 such a broad question, right? It depends on what 15 you're talking about. I mean, what we've seen with 16 respect to this -- there's no criminology studies 17 that I'm aware of, for example, with respect to 18 signage, right? Does the mere presence of a traffic 19 hotline sign change any outcomes? I don't know that 20 because we don't have research that supports that. 21 So it depends on what measures you're talking about. 22 What I'm saying with that paragraph in that report, 23 in that section of the report, is that those red 24 flags so to speak, that Polaris and Homeland 25 Security put out, there is no evidence backing those</p>	<p>1 Q. Is it your opinion that only academics and 2 researchers are qualified to implement 3 anti-trafficking interventions?</p> <p>4 A. No. I mean, I don't consider myself a 5 researcher. I just happen to be a security 6 consultant who engages with the research. So I 7 would say the answer to that is no.</p> <p>8 Q. What about operation of hotels? Are folks 9 who are not academics or researchers qualified to 10 operate hotels, in your opinion?</p> <p>11 A. Qualified to operate hotels? Sure.</p> <p>12 MR. ALLUSHI: Objection.</p> <p>13 A. I would say that's fairly common in the 14 standard, the norm.</p> <p>15 BY MR. BOUCHARD:</p> <p>16 Q. Have you personally evaluated the 17 effectiveness of anti-trafficking interventions in 18 the hospitality industry?</p> <p>19 A. No. What I do is I engage with the 20 research. So I'm not personally a researcher myself 21 most of the time. I mean, I've done research in the 22 past on my own on different topics, you know, 23 security staffing in hospitals which you may have 24 seen on my CV. But, no, I don't personally conduct 25 the research. What I do is spend 20 percent of my</p>
Page 119	Page 121
<p>1 up. They just sound like good ideas. And I know 2 there's a pending FOIA request out there to DHS on 3 this and Polaris trying to get support, like, how 4 did they come up with that list? I have not seen 5 the results of that yet, by the way.</p> <p>6 BY MR. BOUCHARD:</p> <p>7 Q. Are you aware of evidence-based research 8 showing, for example, that DHS indicia are 9 unreliable?</p> <p>10 A. No, not unreliable.</p> <p>11 Q. Are you aware of evidence-based research 12 showing that the Polaris indicia are unreliable?</p> <p>13 A. No, not unreliable. Because I think 14 that's the problem, is nobody is testing this stuff 15 right? There was a great article in Police Chief 16 Magazine which is the International Association of 17 Chiefs of Police Magazine that talks about some of 18 what they thought was indicia on Backpage that turns 19 out that it was no correlation with sex trafficking. 20 So they, you know, get a bunch of yahoos sitting 21 around a room, develop a bunch of red flags or 22 indicators and then at some point they go out and 23 test this stuff and see if it actually does 24 correlate or doesn't correlate. At least in that 25 one police chief article it did not correlate.</p>	<p>1 time reviewing research. Whether it's on 2 trafficking or workplace violence or mass shooters 3 or what have you.</p> <p>4 BY MR. BOUCHARD:</p> <p>5 Q. Have you talked to anybody at the 6 Department of Homeland Security about the campaign 7 signs and indicators?</p> <p>8 A. No. What I mentioned is that we've got a 9 pending -- I've got a colleague that's got a pending 10 request that I helped write. A FOIA request to 11 identify if there was any evidence associated with 12 those indicators. And I believe, if I'm not 13 mistaken, I'm not directly involved, but I believe 14 that FOIA request went to Polaris because they've 15 got federal funding. So they would be subjected to 16 FOIA. And one to DHS, obviously, which would have 17 to respond to that request.</p> <p>18 Q. Do you consider DHS to be an expert on our 19 nation's criminal laws?</p> <p>20 MR. ALLUSHI: Objection.</p> <p>21 A. I wouldn't know how to handle that. I 22 mean, I would say that their primary objective is to 23 protect the homeland from terrorism. Again, I think 24 that's a better question for them, not me.</p> <p>25</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 122..125

Page 122	Page 124
<p>1 BY MR. BOUCHARD:</p> <p>2 Q. Do you believe there are sex trafficking 3 experts working at the Department of Homeland 4 Security?</p> <p>5 A. I don't know, sir.</p> <p>6 Q. Are you aware of whether the Department of 7 Homeland Security trains the nation's federal law 8 enforcement officers on sex trafficking using the 9 Blue Campaign?</p> <p>10 A. That I understand might be a role, sir, of 11 other police departments.</p> <p>12 Q. Is it your opinion that the Department of 13 Homeland Security should not be training the 14 nation's federal law enforcement officers on sex 15 trafficking using the Blue Campaign?</p> <p>16 MR. ALLUSHI: Objection.</p> <p>17 A. Just to be clear, you're saying Blue 18 Campaign. I didn't know the Blue Campaign applied 19 to the training of law enforcement, whether it's 20 federal, state, or local. So -- but taking the Blue 21 Campaign part of it out, I do think it's appropriate 22 for DHS to be training federal law enforcement as 23 well as state and local.</p> <p>24 BY MR. BOUCHARD:</p> <p>25 Q. So what's the distinction you're making</p>	<p>1 Q. Have you ever given talks or presentations 2 to a hospitality organization or association about 3 use of sex trafficking red flags and indicators?</p> <p>4 A. No.</p> <p>5 Q. Are there any sex trafficking red flags or 6 indicators that you believe are reliable?</p> <p>7 A. Yes. I think there's a lot of evidence. 8 If you look at pages 10, 11, 12 of my reports, there 9 is a lot of -- I won't say a lot. There is 10 evidence-based support for some of those questions. 11 There are also various screening tools out there 12 that could be used to, you know, question potential 13 victims to identify whether they're, you know, in 14 fact, a victim or not. So there are a number of 15 tools out there. It was like there was a recent 16 systematic review which looked at 41 different 17 screening tools. Each of those screening tools had 18 evidence-based indicators within them. That's one 19 of the articles I gave you that are cited, that I 20 sent you.</p> <p>21 Q. Let me focus that question on the 22 hospitality industry specifically. Are there any 23 sex trafficking red flags or indicators that you 24 believe are reliable specifically for the 25 hospitality setting?</p>
<p>1 between the Blue Campaign and DHS training federal, 2 state and local law enforcement on sex trafficking?</p> <p>3 A. I don't know that the Blue Campaign is 4 all-encompassing the way you're proposing it is. I 5 understood the Blue Campaign to be primarily focused 6 on the business sector. Not necessarily, I mean, 7 they may refer to it as Blue Campaign, I guess, in 8 the training. But I've never heard it referred to 9 that way.</p> <p>10 Q. Have you talked to anyone in the American 11 Hospitality and Lodging Association about the 12 effectiveness of sex trafficking signs and 13 indicators?</p> <p>14 A. No.</p> <p>15 Q. Anybody at any other hospitality and 16 lodging associations that you've spoken to about 17 that topic?</p> <p>18 A. No, because what I -- I wouldn't ask them 19 about the findings. What I would be asking them for 20 would be the underlying support for anything that 21 they told me. So I would still be looking for that, 22 you know, internal association case study or I would 23 be looking for the published peer-reviewed journal 24 articles which looked at that issue. And I looked 25 for those and they don't exist.</p>	<p>1 A. There are none that are evidence-based. 2 There are some that just make practical sense to me, 3 like not renting by the hour, right? Hourly rentals 4 to me don't make a lot of sense unless you're on a 5 major thoroughfare and you're catering specifically 6 to truckers, for example, who need to shower and get 7 back on the road. But even then, you've got truck 8 stops that handle that kind of traffic. So the 9 short answer is no, I'm not aware of any, you know, 10 that are reliable in the sense that they're 11 evidence-based.</p> <p>12 Q. You said you do believe there are some 13 that made common sense or at least that's what I 14 understood you to say?</p> <p>15 A. I said the hourly rentals doesn't make a 16 lot of sense to me. I mean, I don't see where 17 there's a market need for that except in the case 18 where there's no truck stops and you're on a major 19 thoroughfare and you're catering to truckers, you 20 know, long-haul drivers.</p> <p>21 Q. Any other red flags or indicators that you 22 think make sense for the hospitality industry other 23 than hourly rentals?</p> <p>24 A. No, because as I've gone through the 25 various lists of indicators that have kind of</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 126..129

Page 126	Page 128
<p>1 changed a little bit over time and are a little bit 2 different between the organization that you're 3 looking at. None of them -- all of them have -- all 4 of them have reasons why you may do something that 5 would otherwise be an indicator. Like, for example, 6 accepting cash, right? I mean, that is one of the 7 purported indicators, but there are plenty of 8 reasons why people would use cash. You know, so 9 that in and of itself to me is not any kind of 10 indicator. There is certainly no research to 11 support the notion that only criminals use cash or 12 only sex traffickers use cash. I occasionally use 13 it for some reason.</p> <p>14 Q. I'm going to show you what I'm marking at 15 Plaintiffs' Exhibit 5.</p> <p>16 (Thereupon, marked as Plaintiff 17 Exhibit 5.)</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. And I just direct you to Plaintiff's 20 Exhibit 1. You can look at page 12 where you cite 21 to the Polaris project --</p> <p>22 A. Yes.</p> <p>23 Q. -- that suggests certain questions to ask 24 sex trafficking victims. So I'm going to show you 25 Plaintiffs' Exhibit 5 here.</p>	<p>1 Q. Okay. Is this the source for what you 2 have on the bottom of page 12 and 13 of your expert 3 reports?</p> <p>4 A. It appears to be, yes, sir.</p> <p>5 Q. And you see the copyright on this document 6 is 2011?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Is your understanding that these were 9 questions that were for hospitality participants to 10 ask or law enforcement and other professionals to 11 ask?</p> <p>12 A. Well, it certainly wasn't hospitality. I 13 actually could never figure out who the audience was 14 for this. But it wasn't hospitality. I can almost 15 assure you that. These would be crazy questions to 16 ask a guest.</p> <p>17 Q. You do see here that it says, for example, 18 on page 1 of Plaintiffs' Exhibit 5 under assessment 19 environment and tone, "Conduct the assessment in a 20 comfortable, safe environment. If you are in a 21 police station or in a place where the physical 22 space/conditions are limiting, attempt to create an 23 environment that is as calming and positive as 24 possible."</p> <p>25 Do you see that?</p>
Page 127	Page 129
<p>1 (Clarification requested by stenographer.)</p> <p>2 BY MR. BOUCHARD:</p> <p>3 Q. Do you see that I've put Plaintiffs' 4 Exhibit 5 in front of you, Mr. Vellani, which is the 5 National Human Traffic Resource Center/Polaris 6 Project Comprehensive Human Trafficking Assessment?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And I'll represent to you that when I was 9 looking at the bottom of page 12 of Plaintiffs' 10 Exhibit 1, where you have the list of questions, I 11 didn't know exactly where they came from. And I did 12 some research and it appears they came from this 13 assessment. Is this the source of the questions 14 that appear on pages 12 to 13 of your expert 15 reports?</p> <p>16 A. I don't know. You'd have to go to page 4 17 so I can see that. I don't know if it's the same 18 version or not. Well, that's general trafficking. 19 Can you go down to the one that says sex trafficking 20 questions? I apologize, I don't see numbers on this 21 document. But I saw a table of contents with 22 numbers unless I was mistaken.</p> <p>23 Q. I think it's --</p> <p>24 A. There you go. Yes. Thank you. Those are 25 the questions.</p>	<p>1 A. Yes, that's kind of what I was looking to. 2 We do the same thing in hospitals.</p> <p>3 Q. And just to clarify, are you saying that 4 the questions that are on pages 10 and 11, you 5 agree -- of your report, Plaintiffs' Exhibit 1, do 6 you agree that the questions on pages 10 and 11 are 7 not questions that you would expect somebody in the 8 hospitality industry to ask?</p> <p>9 A. Yes, that's correct. The section was not 10 on hospitality specifically. It was about how to 11 identify a victim. What are the different methods 12 for identifying a victim.</p> <p>13 Q. I want you to look, if you can, sir, back 14 at Plaintiffs' Exhibit 1 page 13, please.</p> <p>15 A. Okay.</p> <p>16 Q. Your last sentence on that page starts 17 "Unlike healthcare environments." Do you see that?</p> <p>18 A. Yes, sir.</p> <p>19 Q. When you say hotels like the United Inn 20 and Suites are not well situated to identify victims 21 of sex trafficking, what do you mean by the term 22 "well situated"?</p> <p>23 A. Well, again, if you think about what is 24 necessary, okay, and even in -- let me be clear 25 about this, because even when you do the things that</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 130..133

Page 130	Page 132
<p>1 I'm about to list, you can still get it wrong. 2 Okay. You can still make mistakes. So what I 3 recommend and I think ultimately what even Polaris 4 is recommending in that is that you go through these 5 invasive screening tools, right? You ask a lot of 6 invasive questions. So in the healthcare 7 environment you go further than that. You also 8 conduct a physical examination. You also do a 9 medical records review. And then you create that 10 safe environment which Polaris talks about, right? 11 And then at least in the environments that I'm 12 talking about, you would give them that further step 13 of creating, you know, the signage that with 14 exclusive directions on how we want you to 15 communicate to us nonverbally that you're a 16 trafficking victim.</p> <p>17 So, no, these are not things that a hotel 18 can do. But these are not necessarily only things 19 that law enforcement can do. The point of it is 20 that it is very difficult to identify a victim even 21 in environments where you can do a medical records 22 review, a physical examination, ask a lot of 23 invasive questions. Separate the trafficker from 24 victim. These are not things a hotel can do. So 25 They're not well situated to actually do much in</p>	<p>1 situated to identify victims of sex trafficking 2 versus saying hotels are not well situated to 3 identify red flags and indicators promulgated by the 4 Department of Homeland Security or Polaris or ECPAT 5 or BEST or any of the other organizations that 6 promulgate sex trafficking red flags and indicators?</p> <p>7 MR. ALLUSHI: Objection.</p> <p>8 A. We're kind of at a crossroads. You either 9 got to pull up the red flags for me or I'm happy to 10 do it on my end. We can do it either way. I need 11 to look at those indicators so I can answer your 12 question properly.</p> <p>13 BY MR. BOUCHARD:</p> <p>14 Q. Okay. Well, take away the words "red 15 flags," because we've been talking about indicators 16 of sex trafficking already. So do you agree there's 17 a difference between identifying a victim of 18 trafficking and identifying indicators of 19 trafficking?</p> <p>20 MR. ALLUSHI: Objection.</p> <p>21 A. We're still in the same place though. 22 Because, you know, again, the indicators that I talk 23 about and the indicators that I recommend to my 24 clients to look out for are not the same as what 25 Polaris and Blue Campaign look at. I would just</p>
Page 131	Page 133
<p>1 terms of identifying an actual victim of 2 trafficking.</p> <p>3 Q. Do you agree with me that a victim of 4 trafficking can be identified through observable 5 behaviors, not just through questions that you pose 6 to the victim?</p> <p>7 A. No.</p> <p>8 Q. Do you agree that identifying victims of 9 sex trafficking is different than identifying red 10 flags of sex trafficking?</p> <p>11 MR. ALLUSHI: Objection.</p> <p>12 A. Well, define what you mean by red flags. 13 Because there's behavioral red flags that are 14 associated with, you know, an environment, I think 15 the way they are presented by DHS or Polaris. And 16 there's also acts that people do, right, that are 17 specific. So I guess I need your help in 18 understanding what you mean by red flags, because, 19 obviously, that's not a -- you know, that's not a 20 normal word, right? That's implying something.</p> <p>21 BY MR. BOUCHARD:</p> <p>22 Q. Well, when you say they're not well 23 situated to identify victims of sex trafficking, 24 what I'm trying to understand is, is there a 25 difference between saying hotels are not well</p>	<p>1 like to be just a little bit more specific so I can 2 give you a proper answer.</p> <p>3 BY MR. BOUCHARD:</p> <p>4 Q. When you say that indicators that you rely 5 upon or that you recommend your clients implement, 6 I'm not sure I got your wording exactly right, but 7 what do you mean? What indicators do you rely upon? 8 What do you recommend your clients implement?</p> <p>9 A. Well, the biggest thing is a screening 10 tool right? The evidence-based screening tool are 11 the best indicators to me. You can look at somebody 12 with a history of STIs, you can look at -- you know, 13 there's dental indicators you can look at. There 14 are all kinds of indicators out there but they're 15 primarily medical based, right? Barring a medical 16 evaluation, then you're looking at the 17 evidence-based screening tools of which I think I 18 mentioned there were recent systematic review which 19 identified 41 different screening tools. The 20 indicators in there are the ones that I'm talking 21 about. Not the indicators that someone paying cash 22 or renting by the hour, right? I'm talking about 23 the real indicators. Not ones that are a bunch of 24 yahoos sitting in a room going ah, that sounds like 25 a good idea.</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 134..137

Page 134	Page 136
<p>1 Q. Do those indicators that you're referring 2 to in your opinion apply to the hospitality setting?</p> <p>3 A. They don't. But that's kind of my point, 4 right? That's what I'm trying to draw your 5 attention to is that there are indicators that are 6 evidence-based. But there is no reasonable 7 practical way to implement that same stuff in a 8 hospitality environment, right?</p> <p>9 And then I went further than that, I said 10 there are some things that just don't make a lot of 11 sense to me, like I can't think of a good reason to 12 rent a hotel by the hour other than the very small 13 rare exception that I gave you.</p> <p>14 Q. So if you were engaged by a hotel in the 15 years 2017 to 2019 to provide consulting services 16 regarding mitigating a risk of sex trafficking at 17 the hotel, are there any indicators, red flags, 18 signs that you would have proposed that the hotel 19 rely upon or use?</p> <p>20 MR. ALLUSHI: Objection.</p> <p>21 A. To identify trafficking?</p> <p>22 BY MR. BOUCHARD:</p> <p>23 Q. To mitigate the risk of sex trafficking?</p> <p>24 A. It's a phenomenal question. I -- again, 25 the only thing that come to mind is the hourly</p>	<p>1 educating them on what they already think they are 2 concerned about. But I think the biggest problem -- 3 and, look, I'm not trying to be flip about this. 4 Sex trafficking is a big problem. I think the 5 biggest problem right now is that people 6 misunderstand the prevalence of it, right? I mean, 7 in 2022 there's only 2,000 documented incidents 8 throughout the entire country. In 2019 there's 9 only, like, 1600 incidents throughout the entire 10 country, right? So people are -- people have been 11 told that this is a bigger problem than what it 12 perhaps is whether by way, you know, of that movie 13 that just came out a few months ago or whether 14 they're seeing the signs every time they go to the 15 barber or hair salon, right? There's a belief it's 16 a bigger problem than what it actually is. In fact, 17 one of the references I gave you is Ella Cockbain's 18 book which talks about all these myths that exist 19 about sex trafficking or human trafficking in 20 general. So what would I -- I would first try to 21 get them to understand reality. That's the first 22 thing that I would do. And then they said, "Well, 23 we don't care about reality. We still want to do 24 something," I might talk about what does the future 25 hold for being able to actually identify nefarious</p>
<p>1 rentals. But even that's not specifically about 2 trafficking, right? That's broader to include other 3 kind of nefarious activities that people want that 4 private space for. So I can't think of any -- like, 5 again, you're just asking me, you know, without 6 supporting evidence or anything. The only thing I 7 think would be disconcerting would be the hourly 8 rentals.</p> <p>9 Q. So if the hotel client -- assuming you 10 consider them clients or customers, whatever -- if 11 the hotel client that had engaged you to act as a 12 consultant said, "Mr. Vellani, we're really intent 13 on addressing the risk of sex trafficking. Can you 14 please provide us with some materials that we can 15 rely upon to train our staff? If you can't, what 16 should we tell our staff?"</p> <p>17 MR. ALLUSHI: Objection.</p> <p>18 A. Again, good question. So I think what I 19 would explain -- and this is what I continually do 20 with my consulting clients -- is I try to educate 21 them on both the actual threat, you know, about this 22 particular incident, the actual threat specifically 23 at their property. And then, obviously, you're 24 telling me they have already got these concerns. So 25 I probably don't need to spend a lot of time</p>	<p>1 activity in a room, whether it's people fencing 2 stolen goods or selling drugs, prostituting or sex 3 trafficking and then I would talk to them about the 4 facial recognition cameras that I mentioned to you 5 earlier.</p> <p>6 There's also some potential technology 7 that exists today where you can count the number of 8 times the guest room is open. The problem is most 9 of that is when you open the guest room from the 10 outside, right? Because you got typically 11 electronic locks on the door and you can interrogate 12 that lock to find out how many times that guest room 13 is opened from the outside but you're not counting 14 the number of times it's been open from the inside. 15 So if you're a prostitute, you're typically opening 16 the guest room from the inside and therefore you're 17 not able to count the number of times that door is 18 opened.</p> <p>19 But, you know, beyond that what would I 20 advise them? Probably not a whole lot. I mean, if 21 they still said we still want something, then, yes, 22 sure. I would refer back to everything else that's 23 out there in the industry. But I'm going to say -- 24 I'm going to give them -- I'm going to temper their 25 expectations on what those things can do. That's</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 138..141

Page 138	Page 140
<p>1 part of my job is to educate my client. As a 2 consultant, my job is to educate my client on what 3 works and what doesn't, and what's promising. Sorry 4 for the long, rambling answer.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. No, I appreciate the thoughtful response. 7 I wanted to ask on page 14 and 15 of 8 Plaintiffs' Exhibit 1, really looking more at 9 page 15 of Plaintiffs' Exhibit 1 which is identical 10 on Exhibits 2 and 3. You talk about staffing at the 11 hotel and, obviously, we've already discussed 12 staffing-related issues. I wanted to ask you a 13 slightly different question which is do you have an 14 opinion about what an appropriate guest to staff 15 ratio is for a hotel like United Inn and Suites?</p> <p>16 A. No, I don't have an opinion on that. You 17 know, I think, you know, that's more of a functional 18 question for an individual hotel as to what their 19 appropriate level of staffing is. I've come across 20 some of these extended stay hotels that don't even 21 have staff at night. Odd, but, you know, it is a 22 practice for some hotels.</p> <p>23 Q. I take it you would not recommend that 24 practice?</p> <p>25 A. I mean, I haven't looked at it enough to</p>	<p>1 A. Yes, sir. 2 Q. And you have virtually identical sentences 3 on pages 16 of Exhibits 2 and 3 about plaintiffs 4 A.G. and G.W. respectively. What is your definition 5 of kidnapping?</p> <p>6 A. So, you know, again, I would have to refer 7 back to, you know, I typically use FBI UCR 8 definitions, Uniform Crime Report definitions. I'm 9 basically -- it's a physical abduction of someone. 10 So against their will.</p> <p>11 Q. Are you planning or intending to testify 12 at trial that any of the plaintiffs were not being 13 held against their will?</p> <p>14 A. I think there's other experts involved in 15 this case that will talk about that. I don't think 16 that's going to be an opinion that I need to give. 17 What I'm saying is there was not a physical 18 abduction. That's the extent of what I'm saying.</p> <p>19 Q. And I assume your answers would be the 20 same as to A.G. and G.W.'s cases?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Where at the bottom of page 16 off 23 Plaintiffs' Exhibit 1, you say, "During the early 24 part of her trafficking on November 14th, J.G. was 25 detained by a De Kalb County Police Department</p>
Page 139	Page 141
<p>1 be able to say one way or the other. Again, I found 2 it odd because it was the first time I had ever seen 3 that. You know, I would typically imagine that 4 there would be some staff -- at least a staff member 5 available to handle after hours check-ins but 6 apparently this particular extended stay doesn't 7 even allow after hours check-in. So...</p> <p>8 Q. On page 14 at the very bottom of 9 Plaintiffs' Exhibit 1, page 14, you say that "The 10 owner of United Inn has been an intermittent member 11 of the Asian American Hotel Owners Association since 12 1998."</p> <p>13 Do you see that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Do you know if he was a member from 2017, 16 2018 or 2019, in any of those years?</p> <p>17 A. As I recall, he wasn't able to pinpoint a 18 specific year, the specific years where he was a 19 member or not a member. So I don't have any 20 understanding of that.</p> <p>21 Q. On page 16 of Plaintiffs' Exhibit 1 your 22 first sentence talks about Plaintiff J.G. knowing 23 her traffickers sufficiently to meet with him in 24 person and you say kidnapping was not involved. Do 25 you see that?</p>	<p>1 police officer at United Inn." Do you see that?</p> <p>2 A. Yes, sir.</p> <p>3 Q. What do you say that quote was "the early 4 part of her trafficking"?</p> <p>5 A. Well, that's a wonderful question. I 6 think her period of trafficking was October 7th of 7 2018 to January of 2019. So if I recall what you 8 just said, November, so that would be early part of 9 her trafficking at United Inn. Let me be clear. 10 That's at United Inn. So October, November, 11 December, January. November would be, you know, 12 within the first month.</p> <p>13 Q. Well, it would be about five, five and a 14 half weeks later?</p> <p>15 A. Right. Yes.</p> <p>16 Q. No?</p> <p>17 A. Yes.</p> <p>18 Q. You say in the next sentence, that "J.G. 19 did not ask the police officers for assistance."</p> <p>20 Do you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. How do you know that?</p> <p>23 A. Because I watched the body camera footage 24 and read a report regarding this incident.</p> <p>25 Q. Did you watch the entirety of the body</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 142..145

Page 142	Page 144
<p>1 camera footage?</p> <p>2 A. Well, again, I'll give you the same answer</p> <p>3 I gave you before. I'm always hamstrung by what</p> <p>4 attorneys give me, right? So based on what I have,</p> <p>5 I see no evidence of that.</p> <p>6 Q. Well, did the footage that you reviewed</p> <p>7 only include J.G. talking to the police or did it</p> <p>8 also include other people who you didn't know</p> <p>9 talking to the police?</p> <p>10 MR. ALLUSHI: I'm going to object to that.</p> <p>11 You can show him the video. I mean, you don't</p> <p>12 have to remember everything, Karim.</p> <p>13 THE WITNESS: Thank you.</p> <p>14 A. Listen, it's body camera footage. So it's</p> <p>15 typical body camera footage. There is typically</p> <p>16 more people there. In this instance I do remember</p> <p>17 there were multiple people there. I don't know what</p> <p>18 I don't have as far as what's on that video.</p> <p>19 BY MR. BOUCHARD:</p> <p>20 Q. I take it that you would defer to the</p> <p>21 evidence and testimony at trial since you were not</p> <p>22 there yourself on November 14th?</p> <p>23 A. Yes, of course.</p> <p>24 Q. What is your recollection of what the</p> <p>25 videos show?</p>	<p>1 parking lot at United Inn and Suites?</p> <p>2 A. I don't know that I know that. That is</p> <p>3 what I suspect, but I don't know that I know that.</p> <p>4 I don't think those people were necessarily</p> <p>5 identified by their street names which were, you</p> <p>6 know, Shaq, Cash, and King.</p> <p>7 Q. Do you know why the police officers had</p> <p>8 gone to the United Inn on November 14th? Was it for</p> <p>9 a sex trafficking-related call or was it for</p> <p>10 something else?</p> <p>11 A. If I'm not mistaken, I believe it was a</p> <p>12 robbery.</p> <p>13 MS. RICHENS: Let me object to the</p> <p>14 question about traffickers, quote, being in the</p> <p>15 vicinity when J.G. was speaking to the police.</p> <p>16 I think that's a vague terminology.</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q. On the bottom of page 16, Plaintiffs'</p> <p>19 Exhibit 1, you say, Mr. Vellani, that "United Inn</p> <p>20 and Suites was not aware of any incidents involving</p> <p>21 J.G. contemporaneously. J.G. never reported the</p> <p>22 incidents to United Inn and Suites."</p> <p>23 What does that mean, "not aware of any</p> <p>24 incidents involving J.G. contemporaneously"?</p> <p>25 A. So based on the November incident I don't</p>
<p>1 A. It showed -- let me -- the part of the</p> <p>2 video that's coming to mind is the part where the</p> <p>3 police car is sitting there, and there's a bunch of</p> <p>4 people gathered around the police officer. He's</p> <p>5 talking to multiple ones of them. I might be</p> <p>6 confusing this also with the report. Because in the</p> <p>7 report she gives her name as Chameeka Grimes which I</p> <p>8 believe was her cousin. So I don't know if that</p> <p>9 came from the police department or that came from</p> <p>10 the cameras, from the body cameras. You know, it</p> <p>11 was multiple people involved in this.</p> <p>12 Q. Based on the -- your recollection of the</p> <p>13 videos, is your recollection that the video footage</p> <p>14 that you reviewed was at the United Inn and Suites?</p> <p>15 A. Yes, sir.</p> <p>16 Q. It wasn't at the police department or some</p> <p>17 other location?</p> <p>18 A. No. I believed it was at the location.</p> <p>19 Q. Which is, as you know, one of the hotels</p> <p>20 where Plaintiff J.G. alleges she was trafficked, is</p> <p>21 that right?</p> <p>22 A. Yes.</p> <p>23 Q. And to your knowledge, sir, were some of</p> <p>24 Plaintiff J.G. traffickers in her immediate vicinity</p> <p>25 when she was talking to the police officer in the</p>	<p>1 know that they knew that that was the missing</p> <p>2 person. That's number one. Number two, again, she</p> <p>3 didn't ask for help from United Inn using, you know,</p> <p>4 one of the several different communication methods</p> <p>5 she had with them. There was a number three there</p> <p>6 but I can't remember what it is.</p> <p>7 The bottom line is, I mean, they didn't</p> <p>8 know about it at the time she was there.</p> <p>9 Q. Are you testifying that is, in fact, true?</p> <p>10 Is that your opinion, or are you saying based on the</p> <p>11 discovery materials you've reviewed and the</p> <p>12 deposition testimony you've reviewed, that's your</p> <p>13 conclusion?</p> <p>14 A. Yes, the latter.</p> <p>15 Q. But I take it you will defer to whatever</p> <p>16 the evidence and the testimony at trial will show?</p> <p>17 A. Yes, that's exactly what I'm saying here.</p> <p>18 I mean, that's based on my review of the case. So</p> <p>19 whatever comes out at trial, I'm happy to defer to</p> <p>20 that.</p> <p>21 Q. And there are different points in your</p> <p>22 report where you use language like there is evidence</p> <p>23 or there is no evidence of certain actions taken by</p> <p>24 United Inn or certain knowledge possessed by</p> <p>25 United Inn. Are you familiar with those terms that</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 146..149

Page 146	Page 148
<p>1 you used in your report, either there being evidence 2 or there being no evidence?</p> <p>3 MR. ALLUSHI: Objection.</p> <p>4 A. Yes.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. And kind of similar to the question I just 7 asked you, Mr. Vellani. Do you intend to testify at 8 trial as to what, in fact, United Inn knew or what, 9 in fact, United Inn did or will you defer to the 10 evidence and testimony at trial?</p> <p>11 MR. ALLUSHI: Objection.</p> <p>12 A. So, I mean, what I can tell you is that my 13 report is, obviously, based on the record as it 14 exists at the time of the report. If something 15 different happens in trial, I will defer to that. 16 And I'll certainly be asking for dailies, you know, 17 to review that if anything is different.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. Right. But what I'm trying to understand 20 is are you planning to offer testimony at trial 21 about what, in fact, United Inn knew or did?</p> <p>22 A. I don't know exactly how to answer your 23 question. If I'm asked what is my understanding of 24 the facts, I will recite those facts at trial. If 25 something is different that's in the record at</p>	<p>1 just geared -- for better or worse, the law 2 enforcement realm is only now gearing up to deal 3 with this even though it was in the 20- -- in the 4 2018 TVPRA. So bottom line on this is if you look 5 at the Uniform Crime Report, specifically the 6 national incident-based reporting system data for 7 DeKalb County, they don't report any incidents of 8 human trafficking. My guess is that we'll continue 9 to see that number go up and up and up as law 10 enforcement is trained to separate prostitution from 11 trafficking. And then hopefully we'll get better at 12 reporting and then we'll get better at crime 13 prevention and we'll start to solve this problem and 14 you'll see that number come back down. That would 15 be my big picture, you know, guesstimate about that.</p> <p>16 Q. Sorry. I didn't mean to speak over you.</p> <p>17 Were you finished?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Okay. You're, obviously, aware that the 20 FBI investigated and the Department of Justice 21 prosecuted Zaccheus Obie and Kikia Anderson for 22 trafficking A.G. and G.W. in 2017 at the United Inn.</p> <p>23 Are you aware?</p> <p>24 A. The Obie brothers, yes. I don't know who 25 this other third person is that you're referring to.</p>
<p>1 trial, then, obviously, I would defer to that. So 2 hopefully I'm answering your question.</p> <p>3 Q. And, obviously, your knowledge of the case 4 is limited by the access you've been given or not 5 given to the materials from the case. Is that fair?</p> <p>6 A. Well, that, and my own independent 7 investigation by way of the crime stats and my 8 interview of Mr. Shareef and my site inspection to 9 the extent that provides anything.</p> <p>10 Q. On page 18 of Plaintiffs' Exhibit 1 you 11 say that -- in that third bullet point, and this is 12 language that also appears in Plaintiffs' Exhibits 2 13 and 3, you said the DeKalb Police Department not 14 report any human trafficking incidents to the FBI in 15 2017 or 2018. Do you see that?</p> <p>16 A. Yes, sir.</p> <p>17 Q. What does that mean to you?</p> <p>18 A. Well, again, it goes back to this notion 19 that we're very early on in the development of 20 trying -- of law enforcement trying to solve these 21 crimes. Like I told you when I gave you the 2022 22 statistics, nationwide there were only 2,000 23 incidents that are documented in the FBI files. And 24 I told you that unequivocally there would be fewer 25 incidents in earlier years because I think we are</p>	<p>1 I may have come across this name but it's not coming 2 to me right now.</p> <p>3 Q. Is it your opinion that there was no minor 4 sex trafficking in DeKalb County in 2017 or 2018?</p> <p>5 MR. ALLUSHI: Objection.</p> <p>6 A. No. I think we've got a record here of 7 such activity, right? What I'm saying is that there 8 was nothing reported to DeKalb County, from DeKalb 9 County to the FBI of any incidents. And think I 10 that goes back to incorrectly identifying victims as 11 criminals sometimes.</p> <p>12 BY MR. BOUCHARD:</p> <p>13 Q. Just -- sorry. Go ahead.</p> <p>14 A. No. I'm sorry. My bad.</p> <p>15 Q. Just under that bullet point, page 18, 16 Plaintiffs' Exhibit 1.</p> <p>17 A. Yes, sir.</p> <p>18 Q. You say that you applied a methodology 19 called the Uniform Crime Reporting methodology. Do 20 you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Is that methodology referenced in the 23 IAPSC Forensic Methodology?</p> <p>24 A. I believe it is. I'm not opening another 25 file. I'm just simply opening the methodology. I</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 150..153**

Page 150	Page 152
<p>1 don't want to make it into something else.</p> <p>2 Q. That's what I was going to ask you to do</p> <p>3 anyway, if you could. Appendix B to Plaintiffs'</p> <p>4 Exhibit 1.</p> <p>5 A. So, yeah, it's on -- it's in the</p> <p>6 references section on page 7 of the methodology.</p> <p>7 Q. Can you point me to it?</p> <p>8 A. If you look at the forensic methodology,</p> <p>9 page 7, it's numbered in the bottom right corner.</p> <p>10 Q. Yes, sir.</p> <p>11 A. I lost it now. Bear with me.</p> <p>12 Q. Okay.</p> <p>13 A. U.S. Department of Justice.</p> <p>14 Q. Yes. Okay. Thank you. On page 22 of</p> <p>15 Plaintiffs' Exhibit 1, you have this tri- -- and</p> <p>16 I'll represent again this is identical to page 22 of</p> <p>17 Plaintiffs' Exhibits 2 and 3. You have this</p> <p>18 triangle that shows offender, place, target, victim</p> <p>19 and then on an exterior triangle, handler, manager,</p> <p>20 guardian. Do you see that triangle?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And, obviously, in the middle of it all is</p> <p>23 crime?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. So what I would like to understand</p>	<p>1 everyday life come across crime opportunities. And</p> <p>2 people in the course of their everyday life come</p> <p>3 across, you know, activities that they do. And some</p> <p>4 of those people are criminals.</p> <p>5 So that resulted in this triangle which is</p> <p>6 originally just the inner circle. Today it sits</p> <p>7 with the inner and outer triangle -- not circle,</p> <p>8 excuse me, triangle -- and then there's now a third</p> <p>9 triangle around it. So this is called the problem</p> <p>10 analysis triangle or the new crime triangle. And</p> <p>11 what it basically says is in order for a crime to</p> <p>12 occur, there has to be a target or victim. So if</p> <p>13 we're talking about property, it would be the</p> <p>14 target. So that would be jewelry, the purse, the</p> <p>15 wallet, whatever. If it's a person-on-person crime</p> <p>16 it could be a victim. Or the victim that owns the</p> <p>17 target.</p> <p>18 And then the third -- the second element</p> <p>19 that has to be in place is that there has to be an</p> <p>20 offender. And then that offender typically comes</p> <p>21 across, you know, the opportunity for a crime</p> <p>22 through his routine activities.</p> <p>23 And then the third element is for there to</p> <p>24 be a place for them to converge in time and space</p> <p>25 for the crime to occur.</p>
Page 151	Page 153
<p>1 is can you sort of apply that analysis and that</p> <p>2 triangle, if you will, to these cases and sort of</p> <p>3 explain to me who are the offenders, who are the</p> <p>4 targets, victims, what was the place, who was the</p> <p>5 handler, handlers, who is the manager, who is the</p> <p>6 guardian?</p> <p>7 A. Yes, sir. So in order for a crime --</p> <p>8 number one, this has its genesis in what is called</p> <p>9 routine activities theory. Routine activities</p> <p>10 theory is one of the three preeminent theories that</p> <p>11 come under the category of environmental</p> <p>12 criminology. So the routine activity theory was</p> <p>13 developed by a guy named Marcus Felson who just</p> <p>14 retired from --</p> <p>15 (Clarification requested by stenographer.)</p> <p>16 A. Marcus Felson. He just retired from a</p> <p>17 university here in Texas. He was the -- when I</p> <p>18 first got to know him he was the dean -- when I say</p> <p>19 got to know him, I mean from afar. When I first got</p> <p>20 to know him from afar, he was the dean at Rutgers</p> <p>21 School of Criminal Justice in New Jersey. He was</p> <p>22 primarily with the home office in England.</p> <p>23 So Dr. Felson came up with routine</p> <p>24 activities theory. And basically what that talks</p> <p>25 about is how people throughout the course of their</p>	<p>1 So if you remove one of those elements,</p> <p>2 the crime doesn't occur. That's the theory. Okay.</p> <p>3 Now, the outside triangle is called the</p> <p>4 controller triangle. Okay. So the three elements</p> <p>5 there are the three controllers. Handler, manager,</p> <p>6 and guardian. There is a third triangle that I</p> <p>7 mentioned that is not shown on here that is still a</p> <p>8 theory that's in development that are called super</p> <p>9 controllers. And I do think super controllers come</p> <p>10 into play here as well. So guardians are protective</p> <p>11 of a target or a victim. Most guardians are</p> <p>12 self-guardians. In other words, if I'm going to do</p> <p>13 a site inspection and a, you know, high crime --</p> <p>14 very high crime property, I'm probably not wearing a</p> <p>15 fancy watch or driving a fancy car because I don't</p> <p>16 want to become victimized, right?</p> <p>17 So the idea is I'm engaging in</p> <p>18 self-guardianship. Ms. Richens, I'm assuming is not</p> <p>19 driving to the gas station with her windows down</p> <p>20 pumping gas with her Louis Vuitton sitting on the</p> <p>21 passenger's side seat. Okay, because she's engaging</p> <p>22 in self-guardianship. So most guardianship is</p> <p>23 self-guardians.</p> <p>24 If you're talking about a parking lot of a</p> <p>25 grocery store, the bystanders in the area are</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 154..157**

Page 154	Page 156
<p>1 guardians as well. They're bystanders, they're 2 serving to some extent as a deterrent. They're the 3 ones that can call the police. They're the ones 4 that can alert management.</p> <p>5 On the offender's side of things, the 6 handler is a person that controls the offender. So 7 historically that's been church. That's been 8 school. You could also say a handler would be a 9 corrections officer. It could be, you know, a 10 community intervention specialist. It's somebody 11 that affects the behavior of the offender.</p> <p>12 On the place side, you have a manager who 13 is responsible for the activities of that place. It 14 probably helps to identify place which I think is 15 also defined in the report. A place is a very 16 small, has a known geographic location, contained 17 within defined property boundaries, serves one 18 general function and has a legal authority to 19 control the use of the place. So in this situation 20 the place is, obviously, United Inn. You could say 21 that there's an interior element and an exterior 22 element to the place. But generally speaking, 23 United Inn is the place. Though we can acknowledge 24 there is interior private space and exterior common 25 areas.</p>	<p>1 probably the best place to talk about it. The 2 manager has super control over it. He's got funding 3 from ostensibly a bank. If you think about -- I 4 don't know enough about the Epstein issue, but I 5 know, like, the banks were sued because they enabled 6 his trafficking. That's why they were sued. They 7 were super controllers. I've had situations with 8 apartments where a bank will call me and want me to 9 do an assessment of on an apartment complex that 10 they are going to fund. The bank is acting as a 11 super controller. If the crime can't get under 12 control, maybe they don't fund that apartment 13 complex rehabilitation. So we've taken the manager 14 out of it. We've taken the place out of it. The 15 super controller is not providing the funding.</p> <p>16 In this situation you've got DeKalb County 17 who identifies this as a high crime property. I 18 don't really understand how they did that. I'm not 19 disputing it but I have no understanding what that 20 methodology was. But what I do not see, I do not 21 see DeKalb County engaging with United Inn and 22 acting as a super controller and saying, "Hey if you 23 don't get the crime problem under control we're 24 going to file a nuisance abatement lawsuit on you." 25 Okay. And what I don't see is the police officers</p>
Page 155	Page 157
<p>1 So a manager is basically responsible for 2 the smooth functioning of the place. In this case, 3 it's a hotel. The place is a hotel. So the smooth 4 functioning of the place is that people are coming 5 to rent rooms. They're getting access to the rooms. 6 They're getting the amenities they need. They have 7 a smooth checkout process. They leave the property, 8 housekeeping comes in, cleans the room and makes it 9 available for the next tenant, the next guest. That 10 is in essence what a place manager does.</p> <p>11 There is a new theory that is in 12 development called place management theory that has 13 some documentation thus far, okay, that talks about 14 how a place manager can affect the security posture 15 of a place. Again, that's in development. Good 16 stuff. Hopefully gets better as we move forward in 17 time.</p> <p>18 But ultimately, what the problem analysis 19 triangle says is that in order for a crime to 20 occur -- to not occur you have to remove one of the 21 three elements. And you can remove one of the three 22 elements by using that controller triangle, or what 23 I mentioned was the super controller triangle.</p> <p>24 So let's just talk about that for one 25 second. If you talk about the manager which is</p>	<p>1 going and talking to the bad guys, the traffickers 2 and saying, "Hey, you know, you guys need to get 3 this guy under control. He needs to stop engaging 4 in whatever bad activities he's engaging in."</p> <p>5 And then and the guardianship side, the 6 super controller would basically typically be the 7 parents, right? The parents, the foster homes, you 8 know, the schools, what have you.</p> <p>9 So in order -- and your question is great. 10 Because this problem analysis triangle I use as a 11 framework for assessing any kind of crime. Okay? 12 So where do I see opportunities here is that -- I 13 use the problem analysis triangle to identify 14 opportunities for intervention. Okay. And to stop 15 the crime. I hope I answered your question.</p> <p>16 Q. I think you did. Can you just -- thank 17 you for that walk-through. Can you just sort of 18 directly, if it's possible, tell me who each of 19 these people are in this case or in these cases? In 20 other words the place is, obviously, United Inn and 21 Suites. I think that's obvious. The offender, I 22 believe, are the traffickers or the alleged 23 traffickers. Can you sort of continue down that 24 path for me and just identify directly who fits in 25 each of those buckets in these cases?</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 158..161**

Page 158	Page 160
<p>1 A. Sure. So J.G. -- I'm sorry -- yes, J.G.,</p> <p>2 A.G. and G.W. would be the victims. The guardians</p> <p>3 would have been ostensibly the parents because</p> <p>4 they're minors. The offenders would be the Obie</p> <p>5 brothers and this other Anderson person you're</p> <p>6 talking about. And then Cash, King and Shaq would</p> <p>7 be the offenders. The handlers for those folks, I</p> <p>8 don't know who those folks are. I don't know if</p> <p>9 they were on probation. I don't know who these guys</p> <p>10 were or whether they had handlers. Certainly not</p> <p>11 effective handlers. The place would be the</p> <p>12 United Inn. But like I mentioned earlier, the place</p> <p>13 could also be -- there's an inside component and an</p> <p>14 outside component, right? It's kind of like if you</p> <p>15 were running a mall that -- or your office, for</p> <p>16 example, I'm assuming you're sitting in a law office</p> <p>17 somewhere. You are responsible for the interior of</p> <p>18 your leased space. The renter, the guest, is</p> <p>19 responsible for the interior of their space, right?</p> <p>20 So if she choose to let in a bad person that's kind</p> <p>21 of on them, right? I provided you as the hotel</p> <p>22 owner I provided you with locks on the doors and</p> <p>23 maybe a peephole but ultimately you're responsible</p> <p>24 for what is going inside your room.</p> <p>25 So there is an inside/outside component.</p>	<p>1 15-year-old and she's clamoring for social media and</p> <p>2 I refuse to let her have it. So -- because I -- you</p> <p>3 know, I don't want her to do it. She's also</p> <p>4 cognizant of the dangers of some parts of social</p> <p>5 media. So she herself engages in self-guardianship.</p> <p>6 So just by the fact that that she's a minor does not</p> <p>7 mean that she can't be engaged in self-guardianship.</p> <p>8 So I think my answer is that, yes, a minor</p> <p>9 can engage in self-guardianship. They do it all the</p> <p>10 time. They don't just leave their phones laying</p> <p>11 around on a public bus, for example. They engage in</p> <p>12 guardianship over that phone, right?</p> <p>13 Q. On page 23 of Plaintiffs' Exhibit 1, the</p> <p>14 first full paragraph says, "Furthermore, criminology</p> <p>15 has shown," and then it goes on from there. Let me</p> <p>16 know when you see that?</p> <p>17 A. Yes, sir. I'm there.</p> <p>18 Q. Okay. I wanted to ask you, and, again,</p> <p>19 this paragraph from page 23 is also in Plaintiffs'</p> <p>20 Exhibits 2 and 3 in the A.G. and G.W. cases. And</p> <p>21 you talk about area crime can be used for</p> <p>22 comparative purposes, and specifically a place could</p> <p>23 be compared to other places with similar</p> <p>24 characteristics in the area. Did you compare</p> <p>25 United Inn to other places with similar</p>
<p style="text-align: center;">Page 159</p> <p>1 Your point earlier about the common areas, that's on</p> <p>2 the management that's on United Inn's owner, period,</p> <p>3 right? So the owner -- the place is United Inn</p> <p>4 inside/outside. And then the manager would be, you</p> <p>5 know, for the common areas it's definitely</p> <p>6 United Inn.</p> <p>7 For the interior of the leased guest room</p> <p>8 right, or rented guest room, that would be the</p> <p>9 person that is, you know, renting the room.</p> <p>10 Q. You said, and your report says this, too,</p> <p>11 that most guardianship is self-guardianship, that is</p> <p>12 people taking action to protect themselves?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Does that apply to minors as well? In</p> <p>15 other words as a security expert who gives advice to</p> <p>16 hotels on mitigating sex trafficking risks, do you</p> <p>17 expect minors to exercise self-guardianship?</p> <p>18 A. So I've actually been thinking about this</p> <p>19 question a lot. You know, I don't know if I</p> <p>20 anticipated your question, but I've been thinking</p> <p>21 about this a lot. I think the law -- and I'm not a</p> <p>22 lawyer -- but the law seems to be very clear on the</p> <p>23 actual consent part of the sex act. That is not</p> <p>24 within the purview of the minor. However, I think</p> <p>25 any of us with children, you know, I've got a</p>	<p style="text-align: center;">Page 161</p> <p>1 characteristics in its area?</p> <p>2 A. No. The whole purpose of this section is</p> <p>3 to basically say this notion of a high crime area is</p> <p>4 a misnomer. Like, you know, the example that I</p> <p>5 typically give and you're not from Houston. I know</p> <p>6 you're not familiar with Houston. There is an area</p> <p>7 north of Houston in the Intercontinental Airport</p> <p>8 that -- it's called Greenspoint, and people for</p> <p>9 years called it Gunspoint. And HPD, the Houston</p> <p>10 Police Department went out from and did -- the crime</p> <p>11 analysts did a deep dive on the crime stats and</p> <p>12 identified really there was only three properties,</p> <p>13 three specific places that had high crime. Those</p> <p>14 three places contributed entirely to the reputation</p> <p>15 of Gunspoint. So they sent HPD officers out there</p> <p>16 to go get the crime problem under control at those</p> <p>17 three properties. And once they did, Gunspoint lost</p> <p>18 its reputation and people started referring to it as</p> <p>19 Greenspoint. Post-COVID it's back to being called</p> <p>20 Gunspoint again. Though I'm not sure how many bad</p> <p>21 places there are that are contributing to that</p> <p>22 reputation.</p> <p>23 So the purpose of this section is really</p> <p>24 to say that, you know, calling something a high</p> <p>25 crime area is somewhat of a misnomer. What I did do</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 162..165

Page 162	Page 164
<p>1 in this case is I did the deep dive on the crime 2 statistics for United Inn and I also reviewed the 3 DeKalb County data which identified United Inn in 4 that top five hot spot analysis. Though I don't 5 fully understand what they predicated that analysis 6 on.</p> <p>7 Q. So you did not, if I'm understanding you 8 correctly, compare United Inn to other hotels with 9 similar characteristics in its area. Is that fair?</p> <p>10 A. I didn't personally do it. It was already 11 done as part of the analysis. As part of DeKalb 12 County's analysis.</p> <p>13 Q. Page 25 of Plaintiffs' Exhibit 1, which, 14 again, is identical to page 25 of Plaintiffs' 15 Exhibits 2 and 3. Talks of nonstranger crimes being 16 difficult or more difficult to prevent than stranger 17 crimes?</p> <p>18 A. Correct.</p> <p>19 Q. Is it your opinion that minor sex 20 trafficking cannot be prevented when it is a 21 nonstranger crime?</p> <p>22 MR. ALLUSHI: Objection.</p> <p>23 A. I'm not saying it can't be prevented. I'm 24 saying that you've got to look at that -- you know, 25 if you're looking at the stuff through the frame of</p>	<p>1 give you just sort of explain that so the 2 intervention part makes sense. If you've got a 3 domestic violence incident, you're not likely to 4 deter or prevent that kind of crime. If you think 5 about -- I don't know if you used to watch cops back 6 in the days, I think it's back on TV again. You 7 would always see the police officer wait for backup 8 when responding to a domestic violence incident. 9 The reason for that is those are very volatile 10 situations that are not going to be prevented by the 11 mere fact that a police officer is standing there. 12 Okay? So preventing is not really the objective. 13 The goal then turns to intervention. So 14 once the officer has backup, you know, then they 15 will intervene, separate the parties and, you know, 16 under some state laws take one party to prison -- 17 excuse me -- to jail. So intervention basically 18 means that you could possibly intervene though it is 19 dangerous. If there is a security officer, a 20 bouncer in a club and you have a bar brawl, two guys 21 fighting over politics or sports, you know, you're 22 probably not going to prevent that thing but you 23 could intervene though it's probably dangerous. So 24 intervention simply means you can stop the crime as 25 it's going on. You cannot prevent it.</p>
Page 163	Page 165
<p>1 that problem analysis triangle, there are multiple 2 places where it can be mitigated, right? There are 3 certain things a place manager can do. There are 4 probably a whole lot more things that the 5 guardianships can do. In other words, the parents, 6 society, church whatever. And there are probably 7 things that can impact that offender. So, no, I'm 8 not saying that. I think this is a nonstranger 9 crime by virtue of the fact this wasn't, like, a 10 forced abduction, a physical abduction, you know, of 11 these three individuals. This was somebody that 12 they became familiar with through, you know, social 13 media or through word of mouth in the case of A.G. 14 and G.W. So they're nonstranger by that virtue but 15 I think in general, nonstranger crimes are harder to 16 prevent. They're not crimes of opportunity for the 17 most part.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. What do you mean when you say intervention 20 once the crime is under way is possible?</p> <p>21 A. Well, I hate to say it, I mean, this 22 paragraph really goes to more the -- to -- to, you 23 know, like, the carjackings in a parking lot, right? 24 In other words, that deterring and preventing the 25 crime are really challenging. And the example I can</p>	<p>1 Q. On page 26 of Plaintiffs' Exhibit 1, you 2 talk about calls for service. For instance, 3 crimes -- and this also appears in Plaintiffs' 4 Exhibit 2 and 3. I wanted to ask you about the 5 specific language that appears at the top of page 27 6 where you say "When assessing crime risk, calls for 7 service should not be used alone and when better 8 information (offense incident data and offense 9 incident reports) is available, calls for service 10 have little value."</p> <p>11 Do you see that?</p> <p>12 A. Yes, sir.</p> <p>13 Q. There's language about using calls for 14 service data in Appendix B to your reports. Which 15 is the IAPSC safe forensic methodology as I'm sure 16 you're aware. That particular language when 17 assessing crime risk calls for service should not be 18 used alone and when better information is available, 19 calls for service have little value. Do you agree 20 that language is not in the IAPSC Forensic 21 Methodology that appears in Appendix B? And if you 22 need to take a look at Appendix B, obviously, feel 23 free.</p> <p>24 A. Wait a minute. Let me see if I 25 understand. You're saying on the top of page 27</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 166..169**

Page 166	Page 168
<p>1 that when assessing crime risk calls for service 2 should not be used alone when better information is 3 available. And calls for service have little value 4 and you want me to compare that to what's in the 5 forensic methodology?</p> <p>6 Q. That's correct. And if it's helpful, I 7 mean, obviously, feel free to look at the entirety 8 of Appendix B, the forensic methodology. I thought 9 you were referring to footnote 1 on page 4 of 10 Appendix B which has virtually identical language to 11 what's on pages 26 and 27 except for that part that 12 I just read about calls for service having little 13 value. So that's what I'm trying to understand. Is 14 that language in the forensic methodology document 15 or is it not?</p> <p>16 A. The little value part is not. So keep in 17 mind that I'm on the committee that writes this 18 forensic methodology. And the language -- that 19 whole language in footnote number 1 is language that 20 I wrote and got approved by the forensic committee 21 and ultimately the membership.</p> <p>22 So, I mean, obviously, I've iterated on 23 that since the time of the report. I've written 24 extensively. I've written two books on this. So 25 you're looking at -- I think 2014 language if I</p>	<p>1 was an actual list of offenses, which is great. 2 Which is exactly what I would prefer. But calls for 3 service depends on the jurisdiction. And in some 4 jurisdictions there is a direct correlation between 5 a call for service and the crime. In some 6 jurisdictions you'll have an initial call type and 7 then you'll have a final call type. So what I'm 8 primarily concerned about is the final call type. 9 If you look at Las Vegas, for example, their calls 10 for service are utter garbage and then basically 11 unusable but they don't give you anything else. So 12 you got to rely on that as a stepping stone to a 13 second request which is for the police reports. 14 Which is what I think you guys did in this case as 15 well as what I did to backfill some of the missing 16 reports.</p> <p>17 So the calls for service for the most part 18 are a stepping stone to get to the police reports, 19 okay. Because I don't know how to request the 20 police reports for a property. I need to give the 21 police department specific numbers. I get those 22 case numbers from the calls for service. So calls 23 for service are nothing more than somebody called 24 the police. Could be an emergency number. Could be 25 a nonemergency number as well, could be a police</p>
Page 167	Page 169
<p>1 remember correctly. In the forensic methodology 2 then you're looking at 2023 language, you know, that 3 I've iterated on. I'm not trying to quote the 4 forensic methodology, in other words.</p> <p>5 Q. Understood. And that's what I just wanted 6 to clarify. Because a lot of footnote 1 in the 7 forensic methodology that's Appendix B appears on 8 pages 26 and 27 of your report.</p> <p>9 A. Yes, in the report. I authored both, yes.</p> <p>10 Q. But the little value language about calls 11 for service does not appear in the forensic 12 methodology document in Appendix B and I just wanted 13 to confirm with you that you agree?</p> <p>14 A. Yes. Yes. That language is not in the 15 forensic methodology.</p> <p>16 Q. Is it your opinion that calls for service 17 are not relevant to conducting a risk assessment of 18 a hotel?</p> <p>19 MS. RICHENS: Objection.</p> <p>20 A. You have to go back and think about what 21 calls for service are, right? They are literally 22 someone calling -- it depends on the jurisdiction. 23 Every jurisdiction is different. You can think 24 about it in this case. When I requested the calls 25 for service from DeKalb County, what they sent me</p>	<p>1 officer happening upon a crime, okay, or happening 2 upon something suspicious and then later identifying 3 it's not a crime. But the problem with calls for 4 service, again, depending on the jurisdiction, you 5 may get everything. You may get fire calls. You 6 may get ambulance calls. You may get police calls. 7 You may get cats stuck up in trees. You may get the 8 vicious pit bull calls. The calls for service are 9 not the meaningful data. They are only meaningful 10 in that they get you to the second set of data which 11 is the police reports.</p> <p>12 I got to be honest, I don't know if any of 13 this stuff is relevant for this case because I don't 14 know what you got when you made your request, but 15 when I made my request, they gave me actual 16 offenses.</p> <p>17 MR. BOUCHARD: If everybody is okay, let's 18 go about maybe five more minutes and then we 19 can take a break. I realize we've been on for 20 a while. Is that okay with everybody?</p> <p>21 MS. RICHENS: Yes.</p> <p>22 THE WITNESS: Okay.</p> <p>23 BY MR. BOUCHARD:</p> <p>24 Q. On page 27, Mr. Vellani, Plaintiffs' 25 Exhibit 1, you have a paragraph in the middle of the</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 170..173

Page 170	Page 172
1 page that starts "in this matter." You see that?	1 and was talking about the DeKalb County Police
2 A. On 27?	2 Department responding to calls for service at the
3 Q. Page 27 of Plaintiffs' Exhibit 1, in the	3 United Inn and Suites approximately two to three
4 middle of the --	4 times per week. Is that deposition testimony that
5 A. Oh, yes, yes.	5 you're familiar with or no?
6 Q. Okay. And you're familiar with that	6 A. Well, not specifically. I mean, I vaguely
7 paragraph?	7 remember something about this, but I don't remember
8 A. Yes.	8 the context.
9 Q. I can represent it also appears in	9 Q. Are you aware of evidence of the
10 Plaintiffs' Exhibits 2 and 3. There's a sentence	10 United Inn asking the De Kalb Police Department for
11 there towards the end of the paragraph that says,	11 recommendations on security at the property?
12 "Further, there is no evidence that," do you see	12 MR. ALLUSHI: Objection.
13 that?	13 A. You mean the police department or the guys
14 A. Yes, that's that super controller part	14 that work there?
15 that I was talking about earlier. That is, you	15 BY MR. BOUCHARD:
16 know, what I'm looking for is for the city, the	16 Q. The police department.
17 authority having jurisdiction, the police department	17 A. No, I don't.
18 to engage with the property to help them get the	18 Q. Okay. Are you aware of evidence of the
19 crime problem under control. You'll see that in	19 United Inn asking the De Kalb Police Department to
20 some cases or some projects. You know, I can't find	20 train hotel staff on sex trafficking?
21 any evidence here where the police department was	21 A. No, sir.
22 engaging with the property to help them get the	22 No.
23 crime problem under control as DeKalb County saw it.	23 Q. Sorry. What did you say, sir?
24 Q. Have you seen a letter from April 2017	24 A. No.
25 from the De Kalb County Police Department to the	25 Q. Okay. all right. The last question before
Page 171	Page 173
1 United Inn and Suites?	1 we take a brief break. So on page 27 you -- of the
2 A. What year was that, sir?	2 respective expert reports, you talk about the
3 Q. April 2017.	3 operative time period. So page 27 of Exhibit 1, you
4 A. Oh, I'm sorry. I thought that was the	4 say the operative time period for the crime analysis
5 date. April 2017. I don't know, sir. You'd have	5 is January 1, 2014 to January 31, 2019. And then if
6 to show it to me and see I've seen it before. I	6 you look at Plaintiffs' Exhibit 2, for example, at
7 don't know.	7 page 27, it says the operative time period for the
8 Q. Have you reviewed deposition testimony	8 crime analysis is January 1, 2014 to July 21, 2017.
9 about the De Kalb Police Department visiting the	9 So it looks like you used over five years for J.G.
10 hotel two to three times per week?	10 but about three and a half years for A.G. and G.W.
11 A. Yes. But are you talking about police	11 Is that correct?
12 officers responding there? Or going there to	12 A. Yes. The forensic methodology reports we
13 investigate vice crimes? Are we talking about C.D.	13 can look at three to five years of data. My normal
14 King's deposition? I'm trying to understand what	14 practice is look at three calendar years and then up
15 we're referring to.	15 until the date of the incident in the subject year.
16 Q. I'm talking about Tahir Shareef and	16 So my normal practice would be what I did in A.G.
17 Ashar Islam's depositions about the volume of DeKalb	17 and G.W. But I didn't want to cut short the
18 County Police Department visits and response to	18 analysis in J.G. So I went ahead and used more than
19 calls for service?	19 five years.
20 A. Yes. I mean, I certainly read their	20 MR. BOUCHARD: Okay. All right. Let's go
21 depositions and their exhibits to those depositions.	21 off the record, please.
22 But I don't know exactly what this April 27 letter	22 THE VIDEOGRAPHER: Okay. Time on the
23 is off the top of my head. I'm sorry. April 2017	23 monitor is 2:19 p.m. and we are off the record.
24 letter.	24 (Recess 2:19 p.m. until 2:35 p.m.)
25 Q. Well, and I actually moved on from that	25 THE VIDEOGRAPHER: Time on the monitor is

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 174..177

Page 174	Page 176
<p>1 2:35 p.m. and we are back on the record.</p> <p>2 BY MR. BOUCHARD:</p> <p>3 Q. Mr. Vellani looking at page 27 of</p> <p>4 Plaintiffs' Exhibit 1. You -- at the bottom of</p> <p>5 page 27 you list certain crimes that you call,</p> <p>6 "noteworthy."</p> <p>7 Do you see that on the bottom of page 27</p> <p>8 of Plaintiffs' Exhibit 1?</p> <p>9 A. Yes, sir.</p> <p>10 Q. And I'll represent to you that there is</p> <p>11 similar language and a similar list on Plaintiffs'</p> <p>12 Exhibits 2 and 3. Looking at page 27 at that</p> <p>13 language of Plaintiffs' Exhibit 1, what makes those</p> <p>14 crimes that you have listed there noteworthy crimes,</p> <p>15 to use your language?</p> <p>16 A. So this is, you know, you've got a good</p> <p>17 question there. I mean, I think the problem that we</p> <p>18 have with this is really what I say on 28. There is</p> <p>19 no evidence. There is no evidence that -- the</p> <p>20 problem I'm having is I'm trying to find correlation</p> <p>21 between sex trafficking and other crimes and I'm not</p> <p>22 finding it. If you, for example, look at instances</p> <p>23 of rape in an apartment unit, you will oftentimes</p> <p>24 also look at burglaries, right? If somebody can</p> <p>25 break in to steel, they can break in to rape</p>	<p>1 of the crimes in the actual body of the report and I</p> <p>2 chose those crimes.</p> <p>3 Q. And just to repeat what I think you said,</p> <p>4 correct me if I'm wrong, you decided to include</p> <p>5 certain crimes that you thought were more serious.</p> <p>6 Is that the distinction, or how did you decide what</p> <p>7 to include?</p> <p>8 A. Yeah. So, again, absence of correlation</p> <p>9 between other crimes and trafficking, right? That's</p> <p>10 the biggest issue. So what I did is I included all</p> <p>11 of Appendix C which is all the crimes at United and</p> <p>12 the, you know, the other -- the crimes against</p> <p>13 persons. The crimes against property. The crimes</p> <p>14 against society. I've included all that in</p> <p>15 Appendix C. I felt compelled to include something</p> <p>16 in the body of the report. So using the typical</p> <p>17 premises security lens, I included the violent</p> <p>18 crimes. The crimes against persons, and then I went</p> <p>19 one step further and included, you know, the</p> <p>20 prostitution events, even though, you know, they're</p> <p>21 supposed to be distinguished from trafficking. So</p> <p>22 that's the short answer. What I did not include is</p> <p>23 property crimes.</p> <p>24 Q. Is it your testimony that there was only</p> <p>25 one death at the United Inn in the five years</p>
<p style="text-align: center;">Page 175</p> <p>1 ostensibly is the argument. I can't find</p> <p>2 correlation between trafficking and other crimes.</p> <p>3 I'm going to give you just a quick example and then</p> <p>4 I'll go on and explain this. I have some very</p> <p>5 high-end clients with, you know, six-star hotels, or</p> <p>6 \$10,000 a month for a one-bedroom apartment unit.</p> <p>7 And they have had trafficking. But they don't have</p> <p>8 violent crimes on the property. They don't have</p> <p>9 rapes on the property. They don't have prostitution</p> <p>10 on the property but they have had trafficking. So I</p> <p>11 actually can't find correlation between other crimes</p> <p>12 beginning trafficking. Okay. So in the absence of</p> <p>13 that, the only thing I can do was look at this</p> <p>14 through the typical premises filter which is, you</p> <p>15 know, here are the violent crimes that have occurred</p> <p>16 and here are the prostitution crimes which, you</p> <p>17 know, we sometimes try to talk about -- when we talk</p> <p>18 about trafficking you need to know the 2008</p> <p>19 Wilberforce TVPRA tells us to distinguish between</p> <p>20 trafficking and prostitution.</p> <p>21 So all I'm saying is these are the more</p> <p>22 serious crimes. I didn't look at -- thefts and all</p> <p>23 that other stuff are summarized in Appendix C. But,</p> <p>24 you know, that's the best explanation of why I'm</p> <p>25 saying noteworthy. I felt compelled to include some</p>	<p style="text-align: center;">Page 177</p> <p>1 preceding January 2019?</p> <p>2 A. Well, that's a good question. Only one</p> <p>3 death or only one murder?</p> <p>4 Q. Well, either. Only one murder?</p> <p>5 A. Well, I don't know about deaths. I mean,</p> <p>6 people can die of natural causes at hotels. You</p> <p>7 know, there's only one murder that is listed in the</p> <p>8 record. There are several people dead. Those could</p> <p>9 have suicide or natural causes.</p> <p>10 Q. On page 28 of Plaintiffs' Exhibit 1.</p> <p>11 A. I'm sorry, what page?</p> <p>12 Q. Page 28 of Plaintiffs' Exhibit 1.</p> <p>13 A. Yes, sir.</p> <p>14 Q. There is language in a section called</p> <p>15 inherent threats and this also is language in</p> <p>16 Plaintiffs' Exhibits 2 and 3. Tell me when you're</p> <p>17 at that section.</p> <p>18 A. I'm there.</p> <p>19 Q. It says, the last sentence of that</p> <p>20 section, "To the extent that," and then it says,</p> <p>21 "Sex trafficking could be considered inherent threat</p> <p>22 though the dearth of prevalent data described above</p> <p>23 temperate concern."</p> <p>24 What do you mean sex trafficking could be</p> <p>25 considered an inherent threat?</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 178..181

Page 178	Page 180
<p>1 A. Well, I mean that it's the private space, 2 right? So somebody could use the private rented 3 space for a number of, you know, elicit behaviors. 4 It could be, you know, extramarital affairs. It 5 could be drug use. It could be building a bomb. It 6 could be collecting, you know, weapons like they did 7 at the MGM Grand and they did the mass shooting. 8 You know, the privacy of the guest room is really 9 what's at issue here. So within the confines of a 10 myriad of other crimes that could occur, you could 11 build a meth lab in a private guest room, right? It 12 has happened before. That's what I mean that sex 13 trafficking could be one of those crimes that occur 14 just by virtue of the privacy of the guest room.</p> <p>15 Q. The first sentence on page 28, Plaintiffs' 16 Exhibit 1, underneath the section entitled 17 Awareness.</p> <p>18 A. Yes.</p> <p>19 Q. That's there being no evidence of United 20 Inn and Suites financially benefiting. Do you see 21 that?</p> <p>22 A. Yes, sir.</p> <p>23 Q. I've asked you sort of a similar style of 24 question at different points of the deposition to 25 the one that I'm about to ask you, which is I take</p>	<p>1 3, you define crime pattern at the top of page 26. 2 Do you see that? 3 A. Yes, sir. 4 Q. And is that -- as we sit here today, is 5 that still your definition of crime pattern or do 6 you have any changes to it? I assume you don't but 7 just confirming. 8 A. Yes. It's not my definition. It's the 9 one promulgated by the International Association of 10 Crime Analysts. 11 Q. On page 28, going back to page 28, the 12 last paragraph says, "Staff that entered guestrooms 13 e.g. housekeeping," and then it goes on to talk 14 about what they're required to report. Do you see 15 that? 16 A. Yes, sir. 17 Q. And you talk about you use the phrase 18 suspicious items or activities in a guest room. Do 19 you see that? 20 A. Yes, sir. 21 Q. And I'll represent to you that same 22 paragraph is in Plaintiffs' Exhibits 2 and 3 as 23 well. Do you know what United Inn and its staff 24 considered, quote, suspicious items or activity in a 25 guest room?</p>
<p>1 it that you will defer to what the evidence and 2 testimony at trial show and leave it to the fact 3 finder to make decisions about United Inn and 4 Suites' liability or no liability. Is that correct? 5 A. Yes. 6 Q. Page 28 of Plaintiffs' Exhibit 1, the 7 second paragraph in the awareness section talks 8 about United Inn not being aware of pimps overseeing 9 prostitutes. Similar type of question there. I 10 assume you'll defer to the evidence and testimony at 11 trial? 12 A. Yes, sir. 13 Q. And two sentences later you say, "There is 14 no evidence in this matter that a pattern of 15 prostitution," and you go on from there "was 16 observable to United Inn and Suites staff." 17 Again, will you defer to the evidence and 18 testimony at trial? 19 A. Yes, sir. 20 MR. ALLUSHI: I'm going to object to the 21 questions about evidence testimony at trial, 22 all of those. 23 BY MR. BOUCHARD: 24 Q. On page 26, Mr. Vellani, of Plaintiffs' 25 Exhibit 1 and the same on Plaintiffs' Exhibits 2 and</p>	<p>1 A. No, that wasn't explicit. But when 2 talking to Mr. Shareef, you know, I don't think he 3 gave me an explicit example. But he -- I think the 4 term either in his deposition or in the interview 5 was anything unusual. That would be not in keeping 6 with, you know, a typical guest room. Like, if 7 somebody walked into that room in the MGM Grand and 8 found 40 assault weapons. You know, obviously, 9 unusual. Somebody building a meth lab, you know, 10 unusual, right? So that type of thing. But I don't 11 think we got into, you know, what specific things 12 that they would be looking for other than anything 13 unusual. 14 Q. Do you know if they would have considered 15 drug paraphernalia in a room anything unusual? 16 A. I don't know. I mean, you'd have to ask 17 them. But I would imagine that they would consider 18 it suspicious given that it's, you know, drug 19 paraphernalia, right? It's illegal. 20 Q. What about guns? 21 A. What about guns? Is that what you said? 22 MR. ALLUSHI: Objection. 23 A. I mean, I don't know if they would 24 consider that unusual or not. I mean, you know, I 25 sometimes have my gun with me when I go to a bad</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 182..185

Page 182	Page 184
<p>1 area and keep it in the hotel. So I don't know what 2 they would consider unusual. I think probably that 3 would be unusual because people don't typically want 4 their gun just laying around. But I don't know. 5 That's a question for them.</p> <p>6 BY MR. BOUCHARD:</p> <p>7 Q. Do you know if they would have considered 8 video cameras in the room unusual?</p> <p>9 A. I don't know if they would or not.</p> <p>10 Q. Large amounts of cash in the room?</p> <p>11 MS. RICHENS: Objection.</p> <p>12 A. I would imagine they would consider that. 13 Again, these are questions for them. He said, you 14 know, basically it was the testimony or the 15 interview was anything unusual.</p> <p>16 BY MR. BOUCHARD:</p> <p>17 Q. Okay. So is that the extent of your 18 knowledge about what suspicious items or activity in 19 a guest room were anything unusual or can you 20 provide any more detail on that?</p> <p>21 A. Well, I think the example that he gave 22 perhaps -- I don't know if it was in both the 23 interview -- I think it was in both -- you know, was 24 a large number of people would also be considered 25 unusual and suspicious and they would try to</p>	<p>1 just not the norm.</p> <p>2 Q. On page 29 you say that, Plaintiffs' 3 Exhibit 1, the last sentence of that top most 4 paragraph on page 29 starts with "there is no 5 evidence." Do you see that?</p> <p>6 A. Yes, sir.</p> <p>7 Q. And there's a similar sentence in 8 Plaintiffs' Exhibits 2 and 3 on pages 29 in those 9 reports. Similar question what I've asked, will you 10 defer at trial to the evidence and testimony of the 11 witnesses?</p> <p>12 A. Yes, sir.</p> <p>13 Q. On page 29 in your reports, you talk about 14 code violations. Do you agree -- based on my 15 understanding of what you've written here, it 16 appears that a 1 percent increase in code 17 enforcement in LA, New York and Seattle was 18 associated with a .1 to .6 percent decrease in 19 violent crime.</p> <p>20 So in LA, New York and Seattle, was it 21 true that an increase in code enforcement was 22 associated with a decrease in violent crime, is that 23 correct?</p> <p>24 MR. ALLUSHI: Objection.</p> <p>25 A. Yes. I mean, that's what it shows. I</p>
Page 183	Page 185
<p>1 investigate that further or ask the person to, you 2 know, reduce the number of people or leave the 3 property. I think that was the specific example 4 that he used.</p> <p>5 Q. Do you know if minors loitering in a 6 parking lot late at night, meeting with different 7 adult men for short periods of time would have been 8 considered suspicious activity?</p> <p>9 MS. RICHENS: Objection.</p> <p>10 MR. ALLUSHI: Objection.</p> <p>11 A. I don't know. Do they know they're 12 minors? That's the biggest problem, right? We 13 don't know if they're minors or not. But, you know, 14 I would suspect that would raise some suspicion. It 15 might be part of the reason why they had police 16 officers there.</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q. Do you know how United Inn staff was to 19 know what qualified as suspicious items or activity?</p> <p>20 A. I don't know if in the deposition that was 21 explored beyond anything unusual. And I don't 22 recall, I mean, if I would have asked him, I would 23 have written it up. But I probably didn't ask him 24 either specifically, you know, how they determined 25 what would be suspicious other than, you know, it's</p>	<p>1 think we're talking about minuscule numbers at this 2 point, right? I mean, I think that's the issue 3 there. I mean, it was fascinating because I think 4 your question to Mr. Shareef was -- I mean, you had 5 a similar question. That's what prompted me to go 6 and look this up to see if there's any relationship 7 there. And this is the only study that I could find 8 on this topic. But you're talking about itty-bitty 9 numbers.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q. On page 30 you say that United Inn 12 conducted informal security risk assessments of the 13 property. Do you see that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. What do you mean by informal security risk 16 assessments?</p> <p>17 A. So Mr. Shareef would talk to Weber and 18 McClelland about any problems on the property. 19 There was this whole notion of him going to these 20 various trainings put on by the tourism board in the 21 county themselves with respect to at least 22 trafficking in prostitution were discussed. So if 23 you think about the security measures that are in 24 place, you can see evidence of the informal risk 25 assessments being conducted. And then when I talked</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 186..189

<p style="text-align: center;">Page 186</p> <p>1 to him, that is one of the questions I asked him, is 2 if they had ever done something informal as opposed 3 to hiring, you know, somebody like me to come out 4 and evaluate what the security needs are. And the 5 way he explained to me how he arrived at his 6 decisions indicated there was an informal security 7 risk assessment process that he was implementing, I 8 don't want to say realtime, but it was something 9 more than that, you know, every five years, we're 10 going to hire a security consultant, right? It was 11 something more than that. It was something 12 occurring not realtime but not irregular, like, 13 every five years.</p> <p>14 Q. I take it it's not your testimony that 15 Mr. Shareef or Mr. Islam have expertise in 16 conducting risk assessments?</p> <p>17 A. No. But I think it is pretty common for 18 property managers, place managers to, you know, 19 assess security needs. Do they have the 20 qualifications that I have? No. But I don't want 21 to diminish, you know, that they can do some things 22 on their own or at least make a determination that, 23 hey, I need to talk to the police officers about 24 this or, hey, I need to go hire a security 25 consultant if it's a deeper problem. I mean, I'm</p>	<p style="text-align: center;">Page 188</p> <p>1 and Suites about enhancing or modifying or improving 2 or refining or what have you security at the hotel?</p> <p>3 MR. ALLUSHI: Objection.</p> <p>4 A. No, they're not my client.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. They have not asked you to do a security 7 risk assessment?</p> <p>8 A. No.</p> <p>9 Q. On pages 30 and 31 of your reports you 10 talk about certain rules of the hotel. For example, 11 the top of page 31 you talk about rules of conduct 12 applicable to guests. Are you familiar with what 13 I'm describing?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Do you know whether the hotel rules at the 16 United Inn were enforced?</p> <p>17 A. We have evidence that they were being 18 enforced because he gave examples of -- he gave 19 examples of when there were too many people going in 20 and out of a room, he would ask them to leave or 21 then he also gave examples of people that didn't 22 follow the rules, he would trespass them from the 23 property. He also gave examples of situations where 24 people were not allowing access to the room and 25 didn't renew their -- their folio -- their --</p>
<p style="text-align: center;">Page 187</p> <p>1 sure we all live at homes with door locks and window 2 locks and maybe secondary locks. And perhaps some 3 of those decisions were decisions we made. Not the 4 builder. You know, some of us are putting LED 5 lighting up around our homes or cameras up around 6 our homes, Ring doorbells. You know, those are part 7 of the informal security risk assessment process 8 that results in something tangible and visible 9 indicating that informal assessment.</p> <p>10 Q. If United Inn had called you in 2017, 11 2018, or 2019 and asked you whether you recommended 12 they conduct a formal security risk assessment, what 13 would you have said?</p> <p>14 MR. ALLUSHI: Objection.</p> <p>15 A. The answer would be -- that's my cell. So 16 I would recommend they do that. You know, we 17 would -- most of us security consultants that exist 18 that are independent would be extraordinarily busy 19 if every property did that. Yeah, if they called 20 and wanted an assessment, I would send them a 21 proposal and may or may not get the gig. They may 22 not like the fact that I have a CPP, who knows.</p> <p>23 BY MR. BOUCHARD:</p> <p>24 Q. Have you in the course of your work in 25 this case made any recommendations to the United Inn</p>	<p style="text-align: center;">Page 189</p> <p>1 their -- their -- he didn't renew their stay. I 2 think if I'm recalling correctly, Weber and/or 3 McClelland also talked about when they saw 4 suspicious activity, management would go in and ask 5 the people to leave or trespass them from the 6 property. So I do see evidence that they were 7 enforcing the rules, including ones that were not 8 specifically explicitly listed.</p> <p>9 Q. Forgive me if I've asked you this question 10 already. I don't think I have. I know I asked you 11 some questions related to training that you might 12 provide to a hotel. But I wanted to ask you 13 directly. Do you think that in 2017 to 2019 hotels 14 should have offered staff trainings on sex 15 trafficking?</p> <p>16 MR. ALLUSHI: Objection.</p> <p>17 A. I struggle with this, Mr. Bouchard, 18 because the research on training does not to date 19 show that it's effective at changing outcomes. 20 Okay. The studies that have been done thus far 21 primarily talk about whether people can simply 22 recall what they learned. You know, I sat through a 23 National Center for Missing Exploited Children 24 training as I was working on something on the 25 consulting side. I'll be the first to admit I</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 190..193

Page 190	Page 192
<p>1 wasn't fully engaged in it. I was doing two 2 different windows on my monitor. You know, and do I 3 recall parts of it? Sure. Do I think there's 4 anything that was in that training that was going to 5 help me change any outcomes for it? I don't think 6 so. There's no studies that show that training is 7 effective at changing the outcomes. And I'm going 8 to give you one example and, you know, again, I'm 9 assuming that counsel has provided you with the a 10 list of the references that I sent. There is a 11 paper by Caitlin, Caitlin Wings (phonetic). It was 12 published in 2022. That study found that if you go 13 so far as to tell the person, a layperson, that 14 there was sex between a minor and an adult, that 15 only 61 percent of those folks could even 16 acknowledge that that's a crime. 21 percent of 17 those people, 21 percent of the 61 percent identify 18 the crime as prostitution. And only 5 percent 19 identified it as trafficking, right? So we got this 20 very -- we've got a problem with this issue. Like, 21 I love the idea of training. I think training has a 22 place. I recommend training to my clients in 23 various areas. But on this trafficking front, I'm 24 not seeing where any current training is effective 25 at changing outcomes here. And that to me is</p>	<p>1 Q. Okay. And did it start for you in 2009 as 2 a result of the passage of the William Wilberforce 3 law that you discussed?</p> <p>4 A. Indirectly. I wasn't aware of its passage 5 in 2008. I became aware of it in 2009 when the City 6 of Houston engaged me.</p> <p>7 Q. Trying to focus on the 2017 to 2019 time 8 period because, obviously, that's when the incidents 9 at issue occurred. And I'd like to focus on 10 hospitality environments specifically. During that 11 time period, what were you advising hospitality 12 companies that engaged you, hotels that engaged you 13 on what steps to take to mitigate the risk of sex 14 trafficking?</p> <p>15 MR. ALLUSHI: Objection.</p> <p>16 A. I don't know that I have an answer for 17 that. Because I don't know how to search my memory 18 and narrow this down to those three years. I mean, 19 what I can tell you is I didn't have any hotels that 20 were doing hourly rentals. So I wouldn't have made 21 a recommendation to not do something that they 22 weren't already doing. I don't have an answer, sir. 23 That's kind of a -- you know, I don't know how to 24 answer that. I don't know -- you know, that's just 25 a hard question to answer.</p>
<p>1 really, really concerning. Especially in light of 2 this '22 study, this 2022 study that's showing that, 3 you know, you're explicitly stating that sex 4 occurred between a minor and adult and only 5 61 percent of the people are saying it's a crime, 6 and only 5 percent of that subset are saying it's 7 trafficking. I mean, that's a real problem. So I 8 don't know that I'm recommending training other 9 than, you know, check the box, say you did it. But 10 I'm not sure that we're changing outcomes here. 11 That what I'm struggling with.</p> <p>12 BY MR. BOUCHARD:</p> <p>13 Q. I think you said that as part of your work 14 as a consultant for the hospitality industry you 15 have been engaged to conduct risk assessments for 16 hotels, and as part of that, you have considered the 17 risks of sex trafficking, is that correct?</p> <p>18 A. Yes, sir.</p> <p>19 Q. And did you engage in that work from the 20 years 2017 to 2019?</p> <p>21 A. I think I've been engaging in that kind of 22 work since, you know -- I've been engaging in hotel 23 work since I started or shortly after I started my 24 company. The actual topic of sex trafficking didn't 25 really start for me until 2009.</p>	<p>1 BY MR. BOUCHARD:</p> <p>2 Q. On page 32 of Plaintiffs' Exhibit 1 as 3 well as Plaintiffs' Exhibits 2 and 3, you have a 4 section called Guest Management.</p> <p>5 A. Yes, sir.</p> <p>6 Q. That talks about a two-factor 7 authentication process?</p> <p>8 A. Yes, sir.</p> <p>9 Q. You know the paragraph I'm talking about?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Are you going to testify at trial that 12 United Inn, in fact, followed that authentication 13 process or are you going to defer to what the trial 14 evidence and testimony shows?</p> <p>15 A. I think both, right? I mean, if somebody 16 testifies to the contrary, that's fine. But I 17 still, you know, this is -- I'm told this is what 18 the process was. It's an extreme -- it's an extreme 19 thing. Just give you an example. I rented four 20 hotel rooms in Normal, Illinois back in May for me 21 and my other -- my subcontractors consultants on the 22 project. All the rooms were listed in my name. And 23 one of my guys lost his key and went to the front 24 desk and was able to get a key using his name. So 25 that's the norm, unfortunately, is that people are</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 194..197**

Page 194	Page 196
<p>1 able to go get hotel room keys with relative ease at 2 hotels. It's a little bit disconcerting. If 3 somebody asked for who is on the registry, that's at 4 least one form of authentication. In this 5 situation, and I would say that probably would be 6 the better norm than what I've seen. But in this 7 case, you know, this is at least what they explained 8 to me how they did it, they would go out and do this 9 two-step process. They get the phone number from 10 the registry. Then they get the person that they 11 call because they don't know who is on the other end 12 of the line to give them the, you know, the last 13 four digits of their driver's license to confirm 14 that person. It's a pretty interesting process.</p> <p>15 Q. On page 33 of Plaintiffs' Exhibits 1, 2, 16 and 3, you talk about vehicle gates, if installed -- 17 this is in the middle of the page, the middle of the 18 physical security paragraph. Vehicle gates if 19 installed would cause traffic or reduce the number 20 of parking spots available. Do you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Is it your testimony that United Inn was 23 prohibited from installing gates?</p> <p>24 A. I don't know if they were prohibited. 25 There have been times in my career where I've made</p>	<p>1 Q. The bottom of page 33 of Plaintiffs' 2 Exhibits 1, 2, and 3 talks about United Inn's video 3 surveillance system.</p> <p>4 A. Yes, sir.</p> <p>5 Q. Do you know what was the hotel's policy 6 and practice on reviewing security camera footage?</p> <p>7 A. Like, you mean reviewing in realtime?</p> <p>8 Q. Or after the fact. Either way.</p> <p>9 A. So a couple things. Number one, he told 10 me they would provide the video to the police upon 11 request. They didn't require a warrant. That after 12 incidents they would review the videos if necessary. 13 And then as far as proactive monitoring, the only 14 things I heard was that it could be monitored from 15 the office in realtime. But, you know, primarily 16 that was a night function because, obviously, 17 they're too busy, not obviously, but they were busy 18 during the day.</p> <p>19 Q. Would you have recommended as a security 20 consultant proactive monitoring of the surveillance 21 footage?</p> <p>22 A. So this is a question I get asked a lot by 23 my clients nowadays because there's a lot of 24 companies that are out there selling or leasing 25 cameras and then offering as a subscription service</p>
Page 195	Page 197
<p>1 recommendations where they installed gates and they 2 have been prohibited. I don't know that they ever 3 asked the question to determine if they were 4 prohibited or not. The issue ultimately becomes one 5 of space. So in this situation if you look at the 6 distance between the street entry point to the 7 building sidewalk, the sidewalk around the building, 8 you'd have a really challenging time putting a 9 vehicle access gate. I'm not saying it's not 10 possible. You could put up a rollup gate. Your 11 typical swing gate you wouldn't have enough room, I 12 don't believe, to put in a gate without either doing 13 one of two things. Either, A, backing traffic up on 14 the street or you'd have to have a setback on that 15 gate so people can pull into the driveway to be able 16 to, you know, use the telephone entry system or call 17 the front desk or enter a code, you have to push 18 that gate in and then you'd have even less room to 19 open that gate. So I don't know if it was 20 physically possible to do it with a typical swing 21 gate. Now, again, a rollup gate would be a totally 22 different story. It would be extremely expensive. 23 And if you did -- if you did set the gate back into 24 the property, you'd be losing parking spots if you 25 were able to physically do it.</p>	<p>1 to be able to monitor in realtime. There have been 2 only a small handful of studies on that. Mostly by 3 a guy named Eric Piza out of Northwestern 4 University. Those studies show limited 5 effectiveness in terms of monitoring the cameras. 6 The question is for what, right? Are we monitoring 7 for suspicious activity? In this situation are we 8 monitoring for too many people going in and out of a 9 room? Are we monitoring for loitering? The 10 question is what are we monitoring for. But in 11 those studies -- and there's a study you can look 12 up; I'd happy to send it to you -- called Project 13 Green Light. It was implemented in Detroit. What 14 they did is install the cost of the -- they 15 installed cameras at specific hot spots. They also 16 installed some other security measures at certain 17 properties with the cameras. And then they put the 18 camera monitors at the 911 dispatch center, provided 19 law enforcement-type training to the dispatchers. 20 And then they had police officers driving around 21 these hot spot areas and when the dispatcher saw 22 something suspicious, they would dispatch the police 23 officers who were already nearby to respond 24 proactively. And that showed some effectiveness. 25 It's an extreme example of how they, you know, get</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Pages 198..201

Page 198	Page 200
<p>1 to solve crime or prevent crime. But I think it's 2 showing some effectiveness. There have not been 3 enough studies on this in the private sector for me 4 to say that it's going to make a whole lot of 5 difference.</p> <p>6 Now, what I alluded to earlier with 7 respect to the facial recognition cameras, if the -- 8 if you have facial recognition cameras, you don't 9 really need monitoring. You can just set a 10 threshold, hey, if there are three unique faces 11 entering into a hotel room, send an alarm when this 12 happens and I'll dispatch the manager or the 13 off-duty police officer to that room to find out 14 what's going on. That would make sense. That 15 conceptually makes sense to me. But to just sit 16 there and monitor these 36 cameras, you know, I 17 don't know. I don't know how effective that would 18 be.</p> <p>19 Q. Bottom of page 34, Plaintiffs' Exhibit 1 20 and 2 and 3, you say that "The police officers 21 schedule is based on time."</p> <p>22 This is in the last paragraph on paragraph 23 34, kind of in the middle -- page 34, kind of in the 24 middle, "The schedule was based on times of reduced 25 hotel staffing at night."</p>	<p>1 center another half mile away because the kids are 2 all walking that far. So there is no single answer 3 to this. That's why you have to do the deep dive on 4 the crime statistics to look for those patterns and 5 trends.</p> <p>6 The only thing I can tell you specifically 7 about this case is what the trends do show. And 8 then you also have to take into account that 9 informal security risk assessment process that 10 Mr. Shareef was engaged in, that, hey, we have less 11 staff. We got more people making noise hanging out 12 and listening to loud music, that's why we're going 13 to put the security, the police officers between 14 10:00 p.m. and 2:00 a.m. and then at 2:00 a.m. 15 things start to quiet down.</p> <p>16 BY MR. BOUCHARD:</p> <p>17 Q. And if I changed my question there to say 18 what time of day do you believe commercial sex 19 activity is most likely to occur at a hotel, would 20 the answer that you just gave be the same?</p> <p>21 A. Yes, but it would be much harder, right? 22 Because the original question was about all crime. 23 And your question now is about, you know, CSA 24 specifically -- commercial sexual activity 25 specifically, you know, I don't know that there is a</p>
Page 199	Page 201
<p>1 Do you see that, sir?</p> <p>2 A. Yes, sir.</p> <p>3 Q. And what -- in your experience, what time 4 of day do you believe crime is most likely to occur 5 at a hotel?</p> <p>6 A. So there's --</p> <p>7 MS. RICHENS: Objection.</p> <p>8 A. There's no single answer to that. I mean, 9 you have to analyze the crime at a specific place to 10 identify what the temporal trends are. I mean, you 11 know, there are typical patterns and trends for 12 specific properties. But those temporal patterns 13 and trends are not consistent among all facilities 14 of the same type.</p> <p>15 So, for example, you know, some shopping 16 centers around where I live have more crime between, 17 like, 3:30 to 6:30. And then, you know, for me, 18 it's obvious because I'm looking for this stuff. 19 Like, what's causing that. It's all those burglars 20 and motor vehicles and shoplifting incidents are a 21 result of the high school that's nearby. They get 22 out of school at 3:30. They all head over, and you 23 can see them heading over to the shopping center, 24 right? So that trend at that particular shopping 25 center is different from the trend at the shopping</p>	<p>1 pattern or trend to that. We don't have enough 2 datapoints to be able to show any kind of trend with 3 that.</p> <p>4 Q. On page 35 you say -- the last sentence on 5 page 35 of Plaintiffs' Exhibits 1, 2, and 3, that 6 "Even with a very high relative risk of crime, it is 7 possible for security measures to be adequate and 8 reasonable."</p> <p>9 I couldn't really figure out how that 10 statement connected to the rest of the report. Can 11 you explain why that's there and -- can you explain 12 why that's there?</p> <p>13 A. Yes. I mean, there's three things. I 14 mean, number one, Warren Sherman who I'm quoting 15 there is probably one of the most preeminent 16 criminologists of our time. He is the author of 17 that whole thing I keep talking about what works, 18 what doesn't, and what's promising, that's his 19 phrase as well.</p> <p>20 In 1995 he was retained or commissioned by 21 Congress to write report on crime prevention, what 22 works, what doesn't and what's promising. So 23 Warren Sherman in 1989 published this study called 24 Violent Stranger Crime at a Large Hotel. That was a 25 quote from there. And ultimately what he was</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 202..205**

Page 202	Page 204
<p>1 talking about is that security measures while -- you 2 know, should meet the standard of care, even when 3 those exist, crime can still happen. So my point is 4 that even though the city had designated this as a 5 high crime property, that even Mr. Shareef testified 6 that it was a high crime area, you know, crime can 7 still happen even when you put reasonable security 8 measures in place.</p> <p>9 And in this situation, if you go back to 10 my opinion, which is that they met the standard of 11 care, even though they were meeting the standard of 12 care, crime can still happen.</p> <p>13 Q. That ties in directly to what I was going 14 to ask you next, which is looking at page 36 of 15 Plaintiffs' Exhibit 1, 2, and 3, where you say 16 "defendants met the applicable standard of care 17 relating to security," what do you consider the 18 applicable standard of care relating to security?</p> <p>19 A. So I think -- you haven't done in this 20 case and I appreciate this. You haven't focused on 21 gates, guns and guards so much, right? You're 22 focusing on those operational security measures to 23 find out, you know, what they're doing with respect 24 to guest management, visitor management, you know, 25 monitoring for nefarious activities, that kind of</p>	<p>1 early as 2013 and 2014 which included sex 2 trafficking and prostitution topics. He was also 3 trained by the police department. I believe that 4 was 2017. He attended that extended stay ordinance 5 in either late 2017 or late 2016 or early 2017. 6 That also addressed human trafficking. Of his own 7 volition, he developed this four-page packet on 8 human trafficking prevention which he made available 9 in paper and electronically to staff. He, you know, 10 also told me that he spoke with staff about this in 11 2018. You know, the two-factor authentication I 12 liked. I thought that was a good practice. Again, 13 you know, even if they were using one factor, it's 14 better than what the norm is which is, like, here, 15 everybody gets a key, right? Like I experienced in 16 May and was upset about.</p> <p>17 You know, they didn't have hourly rentals 18 which I think is really, like, one thing that kind 19 of stands out. Inspecting the rooms every seven 20 days or they wouldn't renew the stay. They had 21 loitering signs which goes into the physical 22 security. They had communication methods. Front 23 desk. Phones in the rooms. Obviously, people have 24 cell phones, but they had somebody on staff there 25 that could be available to the guests 24/7.</p>
<p>1 stuff.</p> <p>2 So when I say the standard of care, it's 3 not necessarily gates, guns and guards because the 4 research on that doesn't show that to be all that 5 effective. Where most properties meet the standard 6 of care and what most facilities of a similar type, 7 i.e., in other hotels, what they do are those 8 operational measures, which, again, I applaud you 9 because that's what you're focusing on.</p> <p>10 So when I see them doing good from an 11 operational security perspective, is that they have 12 a staff that's reported -- that's required to report 13 suspicious items and activity. There was evidence 14 that they were assisting domestic violence victims. 15 They were conducting criminal background 16 investigations to varying degrees depending on 17 whether it was somebody the owner knew or was 18 referred to or somebody outside -- outside that 19 realm. They were conducting the informal risk 20 assessments. They had the written management 21 policies. They had the guest rules of conduct. 22 They were posting the missing persons flyers in the 23 office. He was attending training. I don't know 24 whether he was a member of AA -- AHOA at that time 25 or not. But he was attending various training as</p>	<p>1 As far as physical security, they had the 2 off-duty police officers; they had, you know, 3 limited concealment opportunities outside the 4 facility; they had staff that walked the property at 5 night. They had police officers. They called the 6 police department for too many people being in a 7 room. And that ultimately led to at least one 8 prostitution arrest which means they're actually 9 doing the right things. Right, specifically on this 10 issue.</p> <p>11 They didn't require a warrant. C.D. King 12 testified to this. They didn't require a warrant 13 for the video registry or even room access. I would 14 expect hotels as far as meeting the standard of care 15 to provide video in the guest registry. But to 16 actually provide room access I think is above and 17 beyond the standard of care.</p> <p>18 The off-duty police officers when they 19 informed the manager or the clerk about high traffic 20 in a room, the hotel would deal with it right away. 21 They would ask the person to leave or be trespass 22 and then they maintained that do not rent list.</p> <p>23 Q. I want to take a look at Appendix B to 24 Plaintiffs' Exhibits 1, 2, and 3. We've, obviously, 25 talked a little bit about Appendix B already. It's</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 206..209

Page 206	Page 208
<p>1 the IAPSC Forensic Methodology?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Let me know when you're there.</p> <p>4 A. I'm there.</p> <p>5 Q. I received yesterday from your counsel</p> <p>6 a -- or from United Inn and Suites' counsel, excuse</p> <p>7 me, a revised version of this forensic methodology</p> <p>8 dated September 27, 2023. Which, obviously, is</p> <p>9 dated after your June 14th, 2023 reports in this</p> <p>10 case or these cases. I assume that the forensic</p> <p>11 methodology that's in Appendix B, which is on the</p> <p>12 front page, it says, "Updated January 29th, 2021,"</p> <p>13 that was the effective forensic methodology document</p> <p>14 at the time that you prepared and wrote your</p> <p>15 June 14th reports?</p> <p>16 A. Yes. But in fairness, there's no sub --</p> <p>17 there's no major difference with the actual</p> <p>18 methodology. The only thing that was changed on</p> <p>19 there was the format because I hated the two-column</p> <p>20 stuff. So I pushed for them to make that a</p> <p>21 one-column deal.</p> <p>22 And then we also added in -- we added in</p> <p>23 some additional references and we cited some other</p> <p>24 cases that cited the methodology.</p> <p>25 Q. On page 8 of Appendix B, I'm going to be</p>	<p>1 you to do?</p> <p>2 A. The only real thing it does is validate</p> <p>3 two things. A, that I'm a security consultant.</p> <p>4 And, B, and, most importantly, that I am an</p> <p>5 independent security consultant. In other words,</p> <p>6 I'm not a security consultant that also does private</p> <p>7 investigations or, worse, that I'm a security</p> <p>8 consultant that only recommends one product or one</p> <p>9 service. In other words, I don't work for, you</p> <p>10 know, a guard company that's doing security</p> <p>11 consulting work and only recommending security</p> <p>12 officers, right? I'm not a camera -- I don't work</p> <p>13 for a camera company. Meaning, that I only</p> <p>14 recommend cameras or one brand of cameras.</p> <p>15 So the independence means that I'm product</p> <p>16 agnostic. I only look at what the needs of the</p> <p>17 client are. And that is the only way that I'm</p> <p>18 allowed to make money. I'm not allowed to recommend</p> <p>19 specific products or services.</p> <p>20 Q. What do you mean when you say that it</p> <p>21 validates you as a security consultant?</p> <p>22 A. Well, I mean, because they're looking at</p> <p>23 the education and training. You know, and what your</p> <p>24 role is in your day-to-day worklife, right? They're</p> <p>25 verifying that you are, in fact, a security</p>
<p>1 referring to Appendix B which, again, is the</p> <p>2 January 2021 version.</p> <p>3 A. Yes, sir.</p> <p>4 Q. Just to be clear, was this effective at</p> <p>5 the time that you prepared your report?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Okay. On page 8, there's italicized</p> <p>8 language that says founded in 1984. And then it</p> <p>9 goes on from there. Do you see that?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Are you familiar with that language?</p> <p>12 A. Yes.</p> <p>13 Q. Do you agree with that language?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Is IAPSC a widely recognized and respected</p> <p>16 association committed to establishing and</p> <p>17 maintaining the highest standards for security</p> <p>18 consultants in the industry?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Has it, in fact, established and</p> <p>21 maintained the highest standards for security</p> <p>22 consultants in the industry?</p> <p>23 A. Yes, sir.</p> <p>24 Q. What is the significance of your being a</p> <p>25 member in IAPSC? What does that credential qualify</p>	<p>1 consultant. Not somebody that does primarily -- you</p> <p>2 know, keep in mind that IAPSC was really a response</p> <p>3 to guys that did 99 percent private investigations</p> <p>4 and occasionally they would advise someone on their</p> <p>5 security needs. So that's what the IAPSC was the</p> <p>6 result of and, you know, obviously, I wasn't around,</p> <p>7 back in -- I mean, I was physically around in '84, I</p> <p>8 wasn't in the business in '84. So it was a direct</p> <p>9 response to guys that were primarily private</p> <p>10 vendors.</p> <p>11 Today it stands more today for being</p> <p>12 product agnostic. Meaning, I don't work for a</p> <p>13 camera manufacturer. I don't only recommend ADT as</p> <p>14 your central monitoring center, right? So it's</p> <p>15 product agnostic, that independent part is the core</p> <p>16 of the association.</p> <p>17 Q. In layman's terms, how would you describe</p> <p>18 what is the IAPSC Forensic Methodology?</p> <p>19 A. So the forensic methodology is a framework</p> <p>20 for assessing matters in litigation to provide</p> <p>21 consistency with approach between cases and amongst</p> <p>22 members for developing the opinions.</p> <p>23 Q. On page 2 of Appendix B -- and I think</p> <p>24 this is related to what you were just saying -- it</p> <p>25 says underneath position statement that "The</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 210..213

Page 210	Page 212
<p>1 International Association of Professional Security 2 Consultants does hereby recognize that its members 3 will be called upon to perform as 'forensic 4 consultants' and serve as expert witnesses in a 5 court of law or other legal proceeding."</p> <p>6 Do you see that?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And then it says, "The purpose of these 9 guidelines is to meet the need for a standardized 10 methodology using the evaluation of premises 11 security cases."</p> <p>12 A. Yes, sir.</p> <p>13 Q. Do you agree with that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Are members of the IAPSC authorized by 16 IAPSC to serve as forensic consultants in premises 17 security cases?</p> <p>18 A. So I want to draw a distinction between 19 the words forensic security consultant and an expert 20 witness. A forensic security consultant is 21 basically a security consultant who says that they 22 provide that service. It's not up to the IAPSC to 23 deem you an expert. That's the role of the judge. 24 I mean, you know, these two defense attorneys can 25 hire me all day long but I don't get anywhere unless</p>	<p>1 association. And then at some point people started 2 doing physical security stuff and they had a lot 3 more architectural engineering background. So those 4 are the physical security guys.</p> <p>5 And then there were guys that also, also 6 in addition to one of those two things started doing 7 forensic consultants, you know, serving as -- 8 holding themselves out as forensic consultants.</p> <p>9 So, no. They're not authorizing you to do 10 anything. They're basically saying you are a 11 security consultant. You are an independent 12 security consultant.</p> <p>13 Q. Who do you believe is qualified to apply 14 the IAPSC Forensic Methodology? Only members of 15 IAPSC or other --</p> <p>16 A. Fortunately, it's widely used by most 17 experts that I come across that are not members. So 18 it is fortunately widely accepted by nonmembers as 19 well as members.</p> <p>20 Q. Do you agree that at various points in 21 Appendix B the forensic methodology asks forensic 22 security consultants to use their judgment, 23 experience, and expertise?</p> <p>24 A. Yes.</p> <p>25 Q. And that the IAPSC Forensic Methodology,</p>
Page 211	Page 213
<p>1 the judge approves me, right?</p> <p>2 So to say you're an expert witness implies 3 that the judge has approved you, not the IAPSC. 4 Forensic security consultant basically means that 5 that's what you're primarily engaged in and perhaps 6 you have been approved by a judge somewhere along 7 the way.</p> <p>8 Q. I guess my question was a little bit -- I 9 think it's a little different. Maybe you've 10 answered it. But does IAPSC authorize its members 11 to serve as, quote, forensic consultants and serve 12 as expert witnesses in a court of law or other legal 13 proceeding? I'm not asking if a judge designates 14 them. I'm asking does IAPSC authorize its members 15 to do that?</p> <p>16 A. No. I mean, authorize. I mean, I don't 17 know if it authorizes anyone to do anything. The 18 membership is primarily broken out into four 19 categories. Guys that focus on the -- we talked 20 about this with respect to the CSC designation. The 21 membership is broken down primarily into three 22 components. It really should be four because we 23 should be including information security consultants 24 as well. But number one is a security management 25 consultant which is really the beginning of this</p>	<p>1 in other words, is not a mathematical formula, but 2 instead it requires the security consultant to use 3 their discretion, experience, and expertise in 4 performing an assessment?</p> <p>5 A. Yes.</p> <p>6 Q. Do you agree that forensic security 7 consultants applying the IAPSC Forensic Methodology 8 may analyze information differently based on their 9 different experiences in the security field?</p> <p>10 A. Yes.</p> <p>11 Q. Is it your opinion that this methodology 12 in Appendix B is the correct methodology to use in 13 A.G., G.W. and J.G. cases for a premises security 14 expert?</p> <p>15 A. I'm sorry. What was the last phrase?</p> <p>16 Q. For a premises --</p> <p>17 MR. ALLUSHI: Objection.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. -- security expert?</p> <p>20 A. Yes.</p> <p>21 Q. And your testimony, if I understood it, is 22 that you applied this methodology in coming to your 23 opinions in your expert reports, is that correct?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Did you conduct both a threat assessment</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 214..217**

Page 214	Page 216
<p>1 and a vulnerability assessment?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. And can you walk me through the</p> <p>4 threat assessment first and then walk me through the</p> <p>5 vulnerability assessment?</p> <p>6 A. Sure. So as I mentioned earlier, when we</p> <p>7 were talking about that five-step process, the</p> <p>8 threat assessment in this case really starts on</p> <p>9 page 17, I'm assuming of all three reports, but</p> <p>10 certainly the J.G. report, which is what we've been</p> <p>11 talking about. So the threat assessment component</p> <p>12 starting on page 17 talks about the general nature</p> <p>13 of sex trafficking, the prevalence data, right?</p> <p>14 What do we know nationwide?</p> <p>15 And then I go through and explain the</p> <p>16 methodology in greater detail. Obviously, the</p> <p>17 forensic methodology doesn't give you the</p> <p>18 granularity. So what I'm providing in the first few</p> <p>19 pages, 17, 18, 19, 20, 21, 22, 23, 24, 25, you know,</p> <p>20 basically, all the way to 27, so 17 to 27, is, you</p> <p>21 know, a deeper look at a methodology. It's not the</p> <p>22 methodology. It's a methodology for evaluating the</p> <p>23 crime. The actual crime history on the property.</p> <p>24 And then in 27 -- on page 27 I start the analysis of</p> <p>25 actual crimes as required by the forensic</p>	<p>1 by looking at the existing security measures. So 30</p> <p>2 to 35 provides with you the vulnerability</p> <p>3 assessment.</p> <p>4 Q. And thank you for that overview, sir.</p> <p>5 Appendix B, pages 4 and 5 talk about several areas</p> <p>6 that are numbered 1 through 5 that can be part of a</p> <p>7 vulnerability assessment/security survey. And on</p> <p>8 page 4 before number 1 in that list it says, "The</p> <p>9 following areas in review are not meant to be</p> <p>10 all-inclusive nor all exclusive. The decision to</p> <p>11 review the material is at the judgment/discretion of</p> <p>12 the expert."</p> <p>13 Do you see that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Did you go through and follow all five of</p> <p>16 these items listed on pages 4 and 5, incident</p> <p>17 review, site inspections, security personnel,</p> <p>18 security management programs, security equipment?</p> <p>19 A. Yes, sir.</p> <p>20 Q. In other words, your findings on those</p> <p>21 issues are on pages 30 to 35?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Did you deviate from the IAPSC Forensic</p> <p>24 Methodology in any way in your analysis in these</p> <p>25 cases?</p>
<p>1 methodology, you know, along with the prior ten</p> <p>2 pages.</p> <p>3 And then on page 28 because the forensic</p> <p>4 methodology also requires me to look at, you know,</p> <p>5 something more than just prior similars, it requires</p> <p>6 me to look at the inherent threats which in your</p> <p>7 world I think would encompass the totality of the</p> <p>8 circumstances. You know, the inherent threat</p> <p>9 assessment is on page 28.</p> <p>10 And then because we are in a matter</p> <p>11 involving litigation, obviously, we've got to look</p> <p>12 at kind of that -- you know, I'm not using a legal</p> <p>13 term, but notice, right? We have to look at that</p> <p>14 awareness crime. So that's why I start on page 28.</p> <p>15 And then 29 was just a bonus, because that</p> <p>16 code violation discussion.</p> <p>17 And then the vulnerability assessment</p> <p>18 really comes into its own on page 30 and then goes</p> <p>19 all the way down to page 35. So that is the</p> <p>20 evaluation -- like I told you, in order to</p> <p>21 understand the vulnerabilities, you have to</p> <p>22 understand what existing security measures are. You</p> <p>23 have to understand what you're trying to protect,</p> <p>24 what you're protecting against and where your</p> <p>25 weaknesses are. And you understand your weaknesses</p>	<p>1 A. No.</p> <p>2 Q. Yesterday, I'll represent to you I</p> <p>3 received from United Inn's counsel several</p> <p>4 documents. One of which was a copy of your CV. I</p> <p>5 received some documents in the latter half of the</p> <p>6 day and did not have time to compare your CV to the</p> <p>7 CV that's in your June 14th reports. Are there any</p> <p>8 changes that have been made to your CV since the</p> <p>9 June 14th reports?</p> <p>10 A. Yes, I'm sure there are. The thing that</p> <p>11 comes to mind is I taught a class earlier this month</p> <p>12 to ASIS International on evidence-based security</p> <p>13 practices. So you'll see a November 8th entry on my</p> <p>14 publications and presentations list.</p> <p>15 I also was asked to author The Guideline</p> <p>16 on Human Trafficking Victim Identification and</p> <p>17 Response for the International Association of</p> <p>18 Healthcare Security and Safety. I may have also</p> <p>19 added in the NCMEC training, the National Center for</p> <p>20 Missing & Exploited Children sex trafficking</p> <p>21 training that I took. There may be a couple other</p> <p>22 changes but those are the three that come to mind.</p> <p>23 MR. BOUCHARD: And just as an aside, I</p> <p>24 think I have probably 10 to 15 minutes left.</p> <p>25 Is everybody okay with my finishing out or do</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 218..221**

Page 218	Page 220
<p>1 we need to take a break?</p> <p>2 MS. RICHENS: I'm fine with you</p> <p>3 proceeding.</p> <p>4 (Overtalking.)</p> <p>5 MR. ALLUSHI: -- a break.</p> <p>6 BY MR. BOUCHARD:</p> <p>7 Q. Mr. Vellani, in what areas have you been</p> <p>8 qualified as an expert witness previously?</p> <p>9 A. You mean by a judge?</p> <p>10 Q. That's correct, yes, sir.</p> <p>11 A. So I think all of my prior trial testimony</p> <p>12 would have been just on the general concept of crime</p> <p>13 analysis, crime prevention, and security. But,</p> <p>14 obviously, there's a whole bunch of stuff that falls</p> <p>15 underneath that.</p> <p>16 Q. Have you ever been qualified by a judge as</p> <p>17 an expert witness in sex trafficking?</p> <p>18 A. No. I'm not holding myself out as an</p> <p>19 expert on sex trafficking.</p> <p>20 Q. Understood. I'm just clarifying.</p> <p>21 Has your testimony ever been excluded by a</p> <p>22 court or a judge, to your knowledge, sir?</p> <p>23 A. No, sir.</p> <p>24 Q. Has your testimony ever been limited by a</p> <p>25 court or a judge, to your knowledge?</p>	<p>1 Q. Okay. Do you have any working</p> <p>2 understanding of how many times you've been</p> <p>3 designated as an expert for a plaintiff versus for a</p> <p>4 defendant?</p> <p>5 A. Designations would probably be -- at this</p> <p>6 point in my career probably 60 percent defense,</p> <p>7 40 percent plaintiff, if I had to guess. I hate to</p> <p>8 say this but there are cases where I've learned that</p> <p>9 I was designated by an attorney without my approval,</p> <p>10 without even knowing about the case. So I welcome</p> <p>11 reports and designations. So there are maybe more</p> <p>12 that have occurred that I'm just not aware of.</p> <p>13 And then, you know, if you want to go</p> <p>14 further than that, depositions, and trials, I</p> <p>15 mean...</p> <p>16 Q. Have you been qualified as an expert on</p> <p>17 behalf of a hotel defendant in a civil sex</p> <p>18 trafficking case before?</p> <p>19 A. Sex trafficking? No. I'm not even aware</p> <p>20 of any sex trafficking cases that have gone to trial</p> <p>21 yet.</p> <p>22 Q. Okay. Well, even before trial, when</p> <p>23 there's pretrial motions on experts, are you</p> <p>24 aware -- I don't know, have you been involved in any</p> <p>25 cases as an expert involving sex trafficking</p>
Page 219	Page 221
<p>1 A. That I'm going to hedge and say I don't</p> <p>2 know. Because I have walked in a court in Georgia</p> <p>3 and been told by counsel that the judge is only</p> <p>4 letting in certain data. So I don't know if that</p> <p>5 was a limitation on me or a limitation on the data.</p> <p>6 I took it as a limitation on the data but I don't</p> <p>7 know to say one way or the other because I don't</p> <p>8 know. I don't see those orders or whatever,</p> <p>9 whatever results from that, you know.</p> <p>10 Q. Do you know what kind of case that was in</p> <p>11 Georgia?</p> <p>12 A. Yeah. I want to say it was an apartment</p> <p>13 robbery shooting. And I remember being prepared to</p> <p>14 walk in and talk about 30 prior violent crimes on</p> <p>15 the property and the judge -- I guess, the judge had</p> <p>16 limited it to, like, only 13 being admissible. I</p> <p>17 don't know if I have my numbers right but that's</p> <p>18 generally the premise.</p> <p>19 Q. Approximately how many times in total --</p> <p>20 and emphasis on approximately unless you know the</p> <p>21 exact answer -- have you been designated as an</p> <p>22 expert witness?</p> <p>23 A. Designated?</p> <p>24 Q. Yes, sir.</p> <p>25 A. I have no idea. It's been a lot.</p>	<p>1 lawsuits against hotels?</p> <p>2 A. Yes.</p> <p>3 Q. And have you been involved in those cases</p> <p>4 as an expert for the hotel defendant or the</p> <p>5 trafficking plaintiff?</p> <p>6 A. The only -- the only one that I'm aware of</p> <p>7 right now is actually on behalf of neither of those</p> <p>8 parties. It's on behalf of the security company.</p> <p>9 You know what, let me take that back. So I've been</p> <p>10 designated as a security expert on behalf of the</p> <p>11 security company defendant in two cases. I think I</p> <p>12 was just designated on a case involving a hotel for</p> <p>13 the hotel defendant. Again, these are so early on</p> <p>14 that it's hard for me to know where they're at in</p> <p>15 every case. This is certainly one that's the</p> <p>16 furthest along.</p> <p>17 Q. Have you ever been retained as an expert</p> <p>18 on behalf of a plaintiff in a civil sex trafficking</p> <p>19 case?</p> <p>20 A. No, I haven't.</p> <p>21 Q. Have you been asked to provide any</p> <p>22 opinions rebutting either Naeshia McDowell or</p> <p>23 Darrell Chaneyfield?</p> <p>24 A. I don't know that I was explicitly asked</p> <p>25 to provide opinions regarding Mr. Chaneyfield.</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 222..225

Page 222	Page 224
<p>1 Though I do have opinions. And the other guy, I 2 think is who, the trafficking expert?</p> <p>3 Q. Naeshia McDowell?</p> <p>4 A. Is that the trafficking expert?</p> <p>5 Q. Yes.</p> <p>6 A. I was not asked to rebut any testimony 7 regarding the trafficking experts.</p> <p>8 Q. And I take it based on our prior question 9 and answer, you have not prepared a rebuttal expert 10 report?</p> <p>11 A. For Chaneyfield? No.</p> <p>12 Q. Okay. And you, obviously, don't mention 13 him in your June 14th report, is that correct?</p> <p>14 A. I don't think I knew about him at the 15 time.</p> <p>16 Q. In the finals that I got from your counsel 17 yesterday, there was an excerpt from his deposition. 18 Are you familiar with that or do you need to review 19 it? I can bring it up on the screen if you're not 20 familiar with it.</p> <p>21 A. I'm intimately familiar with it.</p> <p>22 Q. Why is that in your file?</p> <p>23 A. Because Mr. Chaneyfield does not 24 understand what allowed him to be a member. He said 25 two things, quite frankly, that were very offensive</p>	<p>1 A. Well, I provided the methodology because 2 that's the most updated methodology. I always 3 provide the forensic methodology in response. I 4 provide an updated CV and updated methodology, and I 5 provide the references. That's kind of just routine 6 course for me. The classifications of membership 7 and the qualifications for membership were provided 8 in context for the Chaneyfield excerpt. I mean, 9 there's nothing in there that shows that IAPSC is 10 deeming anyone an expert. They certainly didn't 11 deem him an expert, and I certainly had nothing to 12 do with this purported deeming of an expert.</p> <p>13 Q. Is Threat Analysis Group the company that 14 you work for in your capacity as an expert?</p> <p>15 A. Threat Analysis Group, LLC is my company 16 that does everything, right? So it's publications, 17 research, security risk assessments, crime analysis, 18 and the expert work.</p> <p>19 Q. Okay. And from what you've said, my 20 understanding is that your expert work is a fraction 21 of the revenue of Threat Analysis Group, is that 22 correct?</p> <p>23 A. Yes, sir.</p> <p>24 Q. It's less than 50 percent, is that what 25 you're saying?</p>
Page 223	Page 225
<p>1 to me in my professional capacity. Number one, he 2 stated that the IAPSC deemed him an expert. And 3 that is simply factually not true. He outlined a 4 process by which he obtained membership which is not 5 accurate. And then on page 100 he claims that I was 6 part of that process. I've not -- never met 7 Mr. Chaneyfield. I don't know who he is. I've 8 never seen Mr. Chaneyfield. I certainly was not 9 involved in deeming him an expert. That is the most 10 ludicrous proposition I've ever heard.</p> <p>11 Q. Are those the reasons why -- I mean, I 12 still guess I don't understand why that excerpt from 13 his transcript was in your file.</p> <p>14 MR. ALLUSHI: Objection.</p> <p>15 A. Yeah, I provided it for those reasons, 16 because none of what he said on those three pages is 17 true.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. Okay. There were also some documents that 20 I received from your counsel yesterday, three IAPSC 21 documents as being part of your file. One of which 22 was IAPSC qualifications. One of which was IAPSC 23 membership classifications. And one of which was 24 the updated IAPSC Forensic Methodology. Why were 25 those documents in your file?</p>	<p>1 A. Yes, far less.</p> <p>2 Q. Okay. Do you have a ballpark estimate of 3 how much revenue Threat Analysis Group generates 4 annually from your expert work?</p> <p>5 A. No, sir. That's not something I've ever 6 looked at.</p> <p>7 Q. Is it more than a hundred thousand 8 dollars?</p> <p>9 A. I don't know the answers to these 10 questions regarding revenue. I can tell you where I 11 spend my time. But I don't -- you know, that's not 12 something I look at. I don't even have the 13 capability to look at that. I should.</p> <p>14 Q. What percentage of your time do you spend 15 on expert work?</p> <p>16 A. So pre-COVID it was 5 percent. During 17 COVID when everything else shut down it rose to 18 about 10 percent and unfortunately it's still 19 sitting at 10 percent today, roughly. Obviously, I 20 don't know account for every hour of every day. But 21 it's about 10 percent on expert work. 20 percent on 22 research. 70 percent on consulting work.</p> <p>23 Q. Something I didn't ask you earlier about 24 your site inspection at United Inn and Suites. Were 25 there any parameters put up on your site inspection</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 226..229**

Page 226	Page 228
<p>1 in terms of how much time to spend? What you could 2 look at, who you could talk to, or were you free to 3 conduct any and all investigations that you wanted 4 to?</p> <p>5 A. So I would probably fire a client that put 6 in parameters on me with that. No, nobody put any 7 parameters on me.</p> <p>8 MR. BOUCHARD: Okay. So I'm going to go 9 off the record here for a few minutes to look 10 at my notes. I think I've completed my 11 examination of you. I wanted to just make a 12 quick note for the record that we, obviously, 13 don't have a rebuttal expert report from 14 Mr. Vellani. The deadline for rebuttal expert 15 report disclosures has come and gone. I 16 understand it sounds like he has opinions about 17 Mr. Chaneyfield's testimony or report, or I'm 18 not sure. I would oppose and will oppose 19 rebuttal expert testimony from Mr. Vellani 20 because the deadline's passed and there hasn't 21 been a rebuttal expert report provided. And so 22 I'm reserving my right to come back and ask him 23 questions about his rebuttal opinions. But I'm 24 not even going to attempt to do that today 25 because I don't have the benefit of a report</p>	<p>1 his second deposition in order to fully flesh this 2 out. But to the extent that I'm just looking at his 3 report, you know, I mean, I would like the benefit 4 of the second -- of the rest of his deposition. But 5 looking at his report, you know, he talked about -- 6 I disagree with his really first opinion which is 7 that inadequate anti-trafficking materials. I think 8 given that what we talked about with respect to 9 training, what the hotel was doing, they had 10 adequate and reasonable measures in place already. 11 He also gives a second opinion which is inadequate 12 security measures and coverage. I disagree with 13 that for the reasons that I outline in my report and 14 in this deposition. His -- I guess these are 15 specifics about his second opinion. Third, well -- 16 bear with me because I'm having a hard time 17 understanding the layout of his report. He's really 18 just giving reasons.</p> <p>19 Okay. So let me back up. I see the way 20 that he's got this laid out now. So opinion number 21 one, he's got widely available and free 22 anti-trafficking materials and trainings, educate 23 hotel owners and staff about the observable signs of 24 sex trafficking.</p> <p>25 So I think the problem is what we talked</p>
Page 227	Page 229
<p>1 from him on that. So I'm just saying that for 2 the record.</p> <p>3 MR. ALLUSHI: I certainly, for the record, 4 disagree with that to the extent the 5 information that he would rebut is new 6 information and information that was derived 7 from Mr. Chaneyfield's deposition, just for the 8 record.</p> <p>9 You need five minutes to go off the 10 record?</p> <p>11 MR. BOUCHARD: Yes. Let's go off the 12 record for about five minutes. Thank you.</p> <p>13 THE VIDEOGRAPHER: Okay. Time on the 14 monitor is 3:48 p.m. and we're off the record.</p> <p>15 (Recess 3:48 p.m. until 3:57 p.m.)</p> <p>16 THE VIDEOGRAPHER: The time on the monitor 17 is 3:57 p.m. and we are back on the record.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. Mr. Vellani, just briefly, notwithstanding 20 what I said a moment ago before we went off the 21 record, again, I haven't received a rebuttal report 22 and so forth, but you mentioned that you have 23 opinions about Mr. Chaneyfield's testimony. I would 24 like to hear what those opinions are.</p> <p>25 A. Well, I mean, I think in fairness, I need</p>	<p>1 about already. Which is that that's not 2 evidence-based stuff. You know, he didn't cite to 3 any evidence basis for what he's saying.</p> <p>4 Opinion number two, fell far short -- fell 5 far below the industry standard by failing to 6 provide anti-trafficking training materials. So I 7 think they were actually on par with where the 8 industry was at, specifically during the period 2017 9 to 2019.</p> <p>10 Then he goes on to say failed to follow 11 hotel safety and security industry standards during 12 the relevant period pertaining to guest security and 13 safety. I think I've adequately outlined why I 14 disagree with that, but I disagree with that.</p> <p>15 Number four, he gives the opinion adequate 16 training and security measures in effect more likely 17 than not that the subject incidents described in the 18 complaints would have prevented or avoided. I mean, 19 I think even if you were to apply what he says, that 20 it would be really speculative to say that they 21 would have been prevented or avoided.</p> <p>22 And then -- that's it. He's only got 23 those four opinions. So I disagree with three of 24 them and one of them I think is just speculative 25 that even I couldn't say. I couldn't even say the</p>

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.**Karim Vellani on 11/28/2023****Pages 230..233**

Page 230	Page 232
1 opposite. 2 Q. So when you said, you know, I do have an 3 opinion -- I haven't been asked to provide any 4 opinions rebutting him, but I do have opinions. I 5 think you said that just before we took the break. 6 I'm just trying to make sure I understand what those 7 opinions are. Did you just give me them, or are 8 there any others? 9 A. Well, that's the big takeaways, try to do 10 this in short order just looking at his four 11 opinions. But, you know, like with me, you would 12 have elicited additional opinions, very specific 13 opinions that I've been happy to give to you. I 14 would like the benefit, and I understand that 15 there's, you know, deadlines that can't be thwarted, 16 you know, I would like the benefit of hearing the 17 full scope of his specific opinions by way of his 18 deposition. And, obviously, we have not seen his 19 second deposition yet or the continuation of his 20 deposition. But based on his report, that's what I 21 can give you. 22 Q. Okay. Have you read his deposition 23 transcript from the first part of his deposition? 24 A. Yeah. That's how I ended up giving you 25 those excerpts. Yes, sir, I have.	1 MR. BOUCHARD: Okay. That concludes my 2 questioning for you today, Mr. Vellani. I very 3 much appreciate your time. Obviously, Adi or 4 Dana may have questions for you. 5 THE WITNESS: Thank you, sir. 6 MR. ALLUSHI: No questions. 7 CROSS-EXAMINATION 8 BY MS. RICHENS: 9 Q. I just have one question. Mr. Vellani, 10 when you were being questioned earlier today about 11 Exhibit 4 which is the bolo pertaining to [J.G.], 12 you remember that line of questioning? 13 A. Yes, sir -- yes, ma'am. Sorry. 14 Q. And you indicated that you were -- we 15 talked about posting the notice in the office and 16 you said you would not recommend that they go door 17 to door looking for [J.G.]. 18 Do you remember that testimony? 19 A. Yes. 20 Q. Why do you say that? In other words, why 21 would you not recommend that someone go door to door 22 looking for a missing person who there's reason to 23 believe is on the property? 24 A. Well, A, I'm not connecting the dots that 25 a missing persons is what led them to believe she
1 Q. Okay. And any other opinions based on 2 that part that you've reviewed that you're not 3 sharing with me right now? I'm trying to understand 4 what opinions you have as you sit here right now. 5 A. I don't know that -- I don't know that I 6 can lay them all out for you without spending some 7 time with that deposition. Again, I didn't intend 8 to do that until I had the benefit of the 9 continuation of the deposition. So, you know, 10 beyond what I've given you thus far with respect to 11 his written opinions, I don't think I can dig deeper 12 at this point without having some more time to be 13 able to spend with the first deposition and in the 14 continuation just in regard to anything specific 15 that he says. 16 Q. And these questions that I'm asking you 17 are not a waiver or intended to be a waiver of my 18 prior point on the rebuttal deadline having passed. 19 But while I have you here and I have 20 United Inn's counsel here, I wanted to ask you, 21 since you said you had opinions, I wanted to ask you 22 what those were. And I understand you have shared 23 to the extent you can today what your opinions are. 24 Is that a fair summary? 25 A. Yes, sir.	1 was on the property when they got that flyer. 2 That's number one. Number two, I don't think that 3 would be the normal process. That would not be 4 standard practice in a hotel that I have ever heard 5 of that would sit there and go door to door 6 inspecting every room. I mean, if you had reason to 7 believe there was a person in a specific room, sure, 8 you might go and fake an inspection that needed to 9 be done or sent housekeepers over there. But to 10 literally go there and inspect every hotel room 11 seems unreasonable. 12 Q. Any other reason or it's just simply 13 unreasonable? 14 A. Yes. It's just not the normal practice. 15 MS. RICHENS: Thank you. 16 MR. BOUCHARD: I'm sorry. There's one 17 thing I meant to introduce. I apologize. 18 REDIRECT EXAMINATION 19 BY MR. BOUCHARD: 20 Q. Mr. Vellani, we received yesterday your 21 invoices in the A.G., G.W. and J.G. matters. And I 22 can show them to you if you would like me to. But 23 I'll represent to you that Adi and Dana provided 24 them to me. I would like to introduce those 25 respectively as Plaintiffs' Exhibits 5, 6, and 7,

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Pages 234..237

Page 234	Page 236
1 A.G. would be 6 -- I'm sorry --A.G.'s invoices would 2 be 5, G.W.'s would be 6 and J.G.'s would be 7. 3 THE STENOGRAFHER: I think I already have 4 a 5, sir. 5 MR. BOUCHARD: Okay. Let's make A.G. 6, 6 G.W. 7 and J.G. 8. 7 MR. ALLUSHI: Are you going to ask 8 questions about them? 9 MR. BOUCHARD: Am I going to ask him 10 questions about them? 11 MR. ALLUSHI: Right. 12 MR. BOUCHARD: I was going to ask him if 13 he would like to see them or if he's familiar 14 with the invoices that you guys sent me 15 yesterday. 16 MR. ALLUSHI: Okay. I don't have an 17 objection, obviously, at trial you would have 18 to -- you know, I'm not stipulating these are 19 admissible at trial. I'm saying if you want to 20 ask him questions or you want to submit them at 21 this deposition, I have no objection to that. 22 MR. BOUCHARD: Yeah. I don't have any 23 questions about them at this point. I'm not 24 expecting you to stipulate to them. 25 BY MR. BOUCHARD:	1 CERTIFICATE OF OATH 2 3 I, the undersigned authority, certify 4 that KARIM VELLANI remotely appeared before me 5 and was duly sworn on the 28th day of November, 6 2023. 7 8 9 10 11 EDWARD F. KIDD, RPR Notary Public, State of Florida My Commission No. HH126175 Expires: 6/25/25 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Page 235	Page 237
1 Q. But, Mr. Vellani, you do know the invoices 2 that your counsel provided to me yesterday for those 3 three cases? 4 A. Yes, sir. 5 MR. BOUCHARD: Okay. I'm admitting those 6 at least for purposes of this deposition as 7 Plaintiffs' Exhibit 6, 7, and 8. 8 (Thereupon, marked Plaintiff Exhibits 6 9 through 8.) 10 MR. BOUCHARD: Okay. All right. Thank 11 you, Mr. Vellani, for your time. 12 MR. ALLUSHI: We'll read and sign and I'll 13 take a PDF package, thank you. 14 THE STENOGRAFHER: Mr. Bouchard, are you 15 ordering? 16 MR. BOUCHARD: Yes, a PDF package, please. 17 MS. RICHENS: Same here. 18 THE VIDEOGRAPHER: The time is 4:07 p.m. 19 and we're off the record. 20 THE STENOGRAFHER: Would you like a copy, 21 Mr. Mobley? 22 MR. MOBLEY: No. 23 MR. ALLUSHI: We're the same firm. 24 THE STENOGRAFHER: Oh, right. Sorry. 25 (The proceedings concluded at 4:07 p.m.)	1 CERTIFICATE OF REPORTER 2 3 4 I, EDWARD F. KIDD, Registered 5 Professional Reporter, do hereby certify that I 6 was authorized to and did stenographically report 7 the foregoing remote Zoom video-recorded 8 deposition of KARIM VELLANI; that a review of the 9 transcript was requested; and that the transcript 10 is a true record of my stenographic notes. 11 I FURTHER CERTIFY that I am not a 12 relative, employee, attorney, or counsel of any 13 of the parties, nor am I a relative or employee 14 of any of the parties' attorneys or counsel 15 connected with the action, nor am I financially 16 interested in the action. 17 Dated this 30th day of November, 2023. 18 19 20 21 22 23 24 25

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Page 238

	Page 238			
1	ERRATA SHEET			
2	DO NOT WRITE ON TRANSCRIPT			
3	ENTER CHANGES ON THIS PAGE			
4	In Re: G.W. V NORTHBROOK			
5	Case No.: 1:20-CV-05232-JPB			
6	KARIM VELLANI			
7	November 28th, 2023			
8	PAGE	LINE	CHANGE	REASON
9				
10				
11				
12				
13				
14				
15				
16	Under penalties of perjury, I declare that I have read the foregoing transcript of the above proceeding and I hereby swear that my testimony therein was true at the time it was given and is now true and correct, including any corrections and/or amendments listed above.			
17				
18				
19	Signature of Witness _____			
20	Dated this _____ day of _____, _____.			
21				
22				
23				
24				
25				

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: \$10,000..10:54

Exhibits	202:15	234:1	169:25
	vellaniK-2		170:3
vellaniK-1	3:12 37:25	0	173:3,5,8
3:10	38:2 165:4	0 117:11,12	174:4,8,13
37:21,23	173:6		177:10,12
40:6 41:19		003098 98:9	178:16
42:5 43:9	3:13 38:4,		179:6,25
46:16	6	1	184:3,16,
55:5,25			18 193:2
57:9	vellaniK-4	1 37:21,23	194:15
70:17,19	3:15	38:19 40:6	196:2
86:7,9	96:21,24	41:16,19	198:19
107:17	97:2,4	42:4,5	201:5
113:17	104:11,13	43:9 46:16	202:15
126:20	232:11	55:5,25	205:24
127:10		57:9 58:6	216:6,8
129:5,14	3:17	70:17,19	1,000 17:18
138:8,9	126:15,17,	73:24 79:3	10 22:20
139:9,21	25 127:4	86:7,9	53:21
140:23	128:18	107:17	54:18,20,
144:19		113:17	21 62:17,
147:10	vellaniK-6	117:9	19,20
149:16	3:18 235:7	126:20	108:11
150:4,15		127:10	124:8
160:13	3:19	128:18	129:4,6
162:13	235:8,9	129:5,14	217:24
165:1		138:8,9	225:18,19,
169:25	vellaniK-8	139:9,21	21
170:3	3:20	140:23	
173:3	235:8,9	144:19	100 53:22
174:4,8,13		147:10	54:21
177:10,12	\$	149:16	223:5
178:16	\$10,000	150:4,15	10:00 69:11
179:6,25	175:6	160:13	80:6,14
184:3		162:13	82:15
193:2	-	165:1	200:14
198:19		166:9,19	
	--a.g.'s	167:6	10:54 70:6,7

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: 10:55..2014

10:55	9:3	128:2	214:9,12,	173:6
11	16:18	129:14	19,20	174:12
	18:8	219:16	17th 70:20	177:16
	107:21	14 38:10	77:18	179:25
	108:11,17	138:7	18 71:24	180:22
	124:8	139:8,9	147:10	184:8
	129:4,6	14-page 95:5	149:15	193:3
11-	17:18	14th 38:16	214:19	194:15
1100	17:18	42:9,11	19 214:19	198:20
11:00	9:2	140:24	1984 207:8	201:5
		142:22		202:15
11:05	9:4	144:8	1989 201:23	205:24
11:10	9:4	206:9,15	1995 201:20	209:23
11:14	70:7,9	217:7,9	1998 139:12	2,000 136:7
		222:13		147:22
11:58	104:1,	15 47:24	1:00 71:4	
	3	49:17,25	72:15,18	20 120:25
12	108:11,	53:17		214:19
	17 111:16	60:25	2	225:21
	113:17	62:14		
	124:8	74:13	2 37:25	20-
	126:20	138:7,9	38:2,19	148:3
	127:9,14	217:24	43:10	2008 15:4
	128:2	15-year-old	50:10	53:2
120	95:2,3	160:1	55:25	175:18
120-cv-05231	6:5	16 139:21	57:16 58:6	192:5
		140:3,22	70:19 86:8	2009 14:21,
120-cv-05232	6:6	144:18	107:18	23,24
		16-year-old	117:9	15:3,15
120-cv-05233	6:7	101:3	138:10	44:14 50:8
		102:24	140:3	54:25 76:3
12:48	104:3,	103:12,13	147:12	191:25
	5	1600 136:9	150:17	192:1,5
13	108:11	17 30:15	160:20	2011 128:6
	127:14	71:24	162:15	2013 204:1
			165:4	2014 166:25
			170:10	173:5,8

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: 2016..3

204:1	83:17	24	80:2	29th	98:17
2016 204:5	107:2		214:19		206:12
	134:15				
2017 30:17	136:8	24/7	204:25	2:00	69:11
31:5 60:5,	139:16	25	20:17		80:6,14
22 61:9	141:7		53:21		82:15
62:16	173:5		162:13,14		200:14
63:6,24	177:1		214:19	2:19	
79:19,23	187:11	25th	70:22		173:23,24
83:17	189:13		77:23	2:35	173:24
94:21	191:20		79:16		174:1
134:15	192:7	26	165:1		
139:15	229:9		166:11	3	
147:15					
148:22	2021	206:12	167:8	3	38:4,6,19
149:4		207:2	179:24		43:7,8,10
170:24	2022		180:1		55:4 56:8,
171:3,5,23	106:20,25	27	165:5,25		9 57:16
173:8	136:7		166:11		58:6 70:20
187:10	147:21		167:8		79:3 86:9
189:13	190:12		169:24		107:18
191:20	191:2		170:2,3		117:6
192:7	2023	4:6	171:22		138:10
204:4,5		30:15,20	173:1,3,7		140:3
229:8		38:10,16	174:3,5,7,		147:13
2018 30:17	167:2		12 206:8		150:17
31:5 63:15	206:8,9		214:20,24		160:20
139:16	21	173:8	28	174:18	162:15
141:7		190:16,17		177:10,12	165:4
147:15		214:19		178:15	170:10
148:4				179:6	174:12
149:4	2135	106:25	180:11		177:16
187:11	22	150:14,	215:3,9,14		180:1,22
204:11	16	191:2			184:8
		214:19	28th	4:5	193:3
2019 30:17			29	184:2,4,	194:16
31:6 60:5	23	17:17,20		8,13	196:2
63:15,24		160:13,19		215:15	198:20
79:20,24		214:19			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Index: 30..A.G.

201:5	216:5,8,16	233:25	
202:15	232:11	234:1,2,5	<u>9</u>
205:24	<u>40</u> 181:8	235:7,8	
30 185:11	220:7	60 220:6	9 22:20
188:9	41 124:16	61 190:15,	107:16,18,
215:18	133:19	17 191:5	21 108:12
216:1,21	4649 8:1,6	6:00 83:6,	9/11 18:2
219:14	97:17	13,14	911 197:18
31 173:5	4:07	6:30 199:17	99 209:3
188:9,11	235:18,25		
32 193:2		<u>7</u>	9:00 72:11
33 194:15	<u>5</u>		83:6,12,13
196:1		7 86:16	9:32 4:1,6
34 198:19, 23	5 20:18 57:9,13 58:4	150:6,9 233:25 234:2,6	9th 98:20, 21
35 201:4,5 215:19 216:2,21	116:25 117:2,12 126:15,17,	235:7 70 20:14,16 225:22	A
36 198:16 202:14	25 127:4 128:18 190:18	700 17:19 7th 141:6	A.G. 4:15, 19 5:17 6:4 27:7
3:30	191:6		32:9,21
199:17,22	216:5,6,16	<u>8</u>	37:25
3:48	225:16		38:20
227:14,15	233:25	8 86:6,8,9	39:4,17,21
3:57	234:2,4	90:15	43:5 57:17
227:15,17	50 9:21 53:22	206:25 207:7	86:25 87:4
4	224:24	234:6 235:7,9	91:14
4 96:21,24 97:2,4	<u>6</u>	84 209:7,8	92:13,20
104:11,13	6 70:16,19	8th 217:13	93:8,12
117:6	77:22		140:4,20
127:16	184:18		148:22
166:9			158:2

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: a.m...Adi

213:13	68:17	activities	add	26:16
233:21	71:12	135:3	added	206:22
234:1,5	84:25	151:9,24		217:19
a.m. 4:1,6	147:4	152:3,22	addition	
9:2 69:11	155:5	154:13		212:6
70:6,7,9	188:24	157:4	additional	
80:6,14	195:9	180:18		42:6,12
82:15	205:13,16	202:25	accessible	206:23
83:6,14		activity		230:12
104:1,3	45:17 90:8	15:2 16:9	account	42:24
200:14	113:11	42:7 52:11		55:22
AA 203:24		82:8 137:1	abatement	108:18
	200:8	149:7	abduction	180:24
156:24	225:20	151:12	acknowledge	182:18
		180:24	acknowledged	183:8,19
abduction	accurate	189:4	acts	34:13
86:21,22	223:5	197:7	actual	39:10
110:16	acknowledge	200:19,24	address	204:6
140:9,18	105:20	203:13	ability	addresses
163:10	154:23		116:18	55:21
	190:16		absence	acknowledged
ability		acts 89:7	act	acts 89:7
116:18		92:5 111:2	7:13,18	addressing
absence	33:23	131:16	110:7,13,	135:13
175:12	act	actual 38:22	14 111:8,9	adequacy
176:8	7:13,18	45:14	135:11	actual 38:22
academics		53:13 87:8	159:23	adequate
120:1,9		89:9 131:1	accepted	135:21,22
accepted		135:21,22	acting	159:23
116:19		159:23	action	168:1
212:18		168:1	36:10	adequately
accepting		169:15	37:1	Adi 4:16
126:6		176:1	159:12	8:25 28:15
access 42:13		191:24	actions	206:17
48:16		206:17		232:3
49:21		214:23,25		233:23

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: adjust..Allushi

adjust	80:11	advised	23:13,17	154:4
Administration		97:15	38:18 41:2	all-
16:24		advising	67:19 90:2	encompassing
admissible		66:22	98:18	123:4
219:16		192:11	107:21	all-inclusive
234:19		advocate	108:14	216:10
admit	189:25	10:18	110:21	
admitting		afar	111:8,23,	allegations
235:5		151:19,20	24 129:5,6	36:19,21
adopt	58:23	affairs	131:3,8	91:3,14
ads	90:9,12	178:4	132:16	alleged 29:5
95:16		affect	165:19	32:1 37:1
ADT	209:13	155:14	167:13	157:22
adult	183:7	affects	184:14	alleges
190:14		154:11	207:13	143:20
191:4		affidavit	210:13	
advance		70:12	212:20	alley 89:10
54:10		affidavits	213:6	allowed
advancement		68:24	agreeable	22:20
96:8		80:10,12,	6:20 8:8	82:24
		18,19	agreed 7:7,	208:18
advertise		afternoon	16	222:24
31:6		71:19	agreement	allowing
advertisements		72:18	6:25	188:24
31:12		73:24	ahead 66:18	alluded
advertising		74:15	74:9 84:2	198:6
85:18		104:7	airport	Allushi 4:16
90:13		age 33:25	85:22	7:7 21:1
advice		ages 16:11	149:13	26:5,18
159:15		agnostic	173:18	27:19,23
advise		208:16	AHOA 203:24	28:6,11
137:20		209:12,15	airport	29:17
209:4		agree 8:3	77:11	34:21
			161:7	35:14
			alarm 198:11	36:13 37:3
			alert 95:23	47:23
				58:16 60:7

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: ambulance..Appendix**

61:14	64:7	227:3	214:24	anti-
65:2	66:16	232:6	216:24	trafficking
67:1,22		234:7,11,	218:13	117:14
84:2,20		16 235:12,	224:13,15,	118:8
85:22		23	17,21	120:3,17
91:19			225:3	228:7,22
92:25	93:3	ambulance		229:6
94:23	99:9	169:6	analysts	
102:9			161:11	anticipated
103:17		155:6	180:10	159:20
105:17		American	analyze	apartment
112:5		12:1,4	199:9	51:7 58:25
114:9		19:3 114:4	213:8	156:9,12
117:17		123:10	analyzed	174:23
118:12		139:11	44:16	175:6
120:12		amount	60:14	219:12
121:20		amounts	ancillary	apartments
122:16		182:10	18:7	86:3 156:8
131:11		analyses	and/or	apologize
132:7,20		45:3	75:6	101:25
134:20		analysis	189:2	127:20
135:17		18:13	28:1,9,19	233:17
142:10		22:16	148:21	
146:3,11		35:22	158:5	app 74:19
149:5		39:11,15	anecdotal	apparently
162:22		40:13	117:23,24	139:6
172:12		47:14	annual	appears
179:20		51:14	19:8	127:12
181:22		151:1	57:7 105:9	128:4
183:10		152:10	annually	147:12
184:24		155:18	225:4	165:3,5,21
187:14		157:10,13	answering	167:7
188:3		162:4,5,	147:2	170:9
189:16		11,12	answers	184:16
192:15		163:1	140:19	Appendix
213:17		173:4,8,18	225:9	41:10
218:5				150:3
223:14				

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: applaud..assessment**

165:14,21,	114:16,22	202:6	23:21
22 166:8,	209:21	areas 24:18,	217:12
10 167:7,	approval	19,23 77:3	asks 212:21
12 175:23	220:9	89:16,25	assault
176:11,15		91:7	181:8
205:23,25	approved	115:23	assess
206:11,25	166:20	154:25	186:19
207:1	211:3,6	159:1,5	assessing
209:23	approves	190:23	157:11
212:21	211:1	197:21	165:6,17
213:12	approximate	216:5,9	166:1
216:5	53:20,23	218:7	assessment
applaud	approximately	argument	209:20
203:8	9:4 52:14	175:1	
applicable	74:5 172:3	arrest 14:7	20:9,12,22
188:12	219:19,20	205:8	21:4,5
202:16,18	April 170:24	arrests 48:3	44:8,25
applicant	171:3,5,	arrived	45:6,7,19,
23:14	22,23	73:24	21 46:3,4,
application	architectural	186:5	9,12,25
114:19	212:3	article	47:6,9
applied	area 22:13	57:1,3	50:17
122:18	24:21	119:15,25	64:24
149:18	44:22	articles	65:24
213:22	45:4,12	55:20	66:9,11,12
apply 39:19,	71:13,15,	123:24	67:7,14
22 134:2	16,18	124:19	83:18,19,
151:1	72:8,9,25	Ashar 29:20	21 102:7
159:14	73:1 74:2	32:16 35:7	103:2
212:13	89:21,22	97:15	127:6,13
229:19	90:6 100:4	171:17	128:18,19
	153:25	Asian 12:4	156:9
applying	160:21,24	139:11	167:17
213:7	161:1,3,6,	ASIS 19:2	186:7
approach	25 162:9		187:7,9,
81:22 82:5	182:1		12,20
			188:7

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: assessment/security..aware

200:9	139:11	128:22	authored
213:4,25	180:9	226:24	167:9
214:1,4,5, 8,11	207:16 209:16	attend 19:6	authority
215:9,17	210:1	attended	154:18
216:3	212:1	9:18	170:17
assessment/ security	217:17	12:10,16 13:13	authorize 211:10,14, 16
assessments	associations	204:4	
216:7	84:16	attending	authorized
20:5,6	123:16	203:23,25	210:15
21:8 22:16	assume 16:6	attention	authorizes
52:9,15,19	33:2,7 71:22	134:5	211:17
53:5 54:18	140:19	attorney	authorizing
57:8	179:10	220:9	212:9
185:12,16, 25 186:16	180:6 206:10	attorneys	auto 66:2
191:15		48:23	avoided
203:20	assuming	57:24	229:18,21
224:17	135:9 153:18	78:20	
asset 46:1	158:16	142:4	aware 23:10
assigned	190:9	210:24	31:4 33:10
17:5	214:9		34:24
assistance	assumption	audience	41:5,14,25
141:19	16:3	128:13	58:22
assisted	assure	audio 115:3	59:2,23
18:5	107:3,4	audit 82:2,	62:15
assisting	128:15	13,17	69:21
203:14	Atlanta	audits 82:10	82:22 83:2
association	30:20,22	authentication	85:24 86:4
12:2,5,8	ATM 57:2,6	91:5 100:5	
19:5 24:4	attachment	193:7,12	105:2
119:16	97:3,22	194:4	107:6,8,9, 10,14
123:11,22	98:7	204:11	118:17
124:2	attempt	author	119:7,11
		201:16	122:6
		217:15	125:9

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: awareness..based

144:20,23	76:20,25	67:18,20	136:15
148:19,23	86:15	68:2,8,14	barbershop
165:16	89:10	83:25	111:6
172:9,18	92:14	84:7,9,12,	
179:8	98:18	18,22,24	barely
192:4,5	102:14	85:3	106:21,22
220:12,19,	104:5	203:15	barrier 92:2
24 221:6	107:1	212:3	barring
awareness	110:11	backing	96:6,14
40:16	112:23	118:25	115:25
178:17	125:7	195:13	133:15
179:7	129:13		
215:14	137:22	Backpage	based 8:15
	140:7	31:10,18	21:4
	147:18	95:15	34:18,23
B	148:14	119:18	39:12 41:5
bachelor's	149:10	backup	47:9 60:16
13:6 22:7	161:19	164:7,14	63:4,7
back 10:3	164:5,6	bad 99:23,	64:12
14:21	167:20	25 110:1	79:15
20:15	174:1	149:14	80:15
31:13	180:11	157:1,4	83:23
40:24 41:9	193:20	158:20	102:11
44:1,17,25	195:23	161:20	113:2
46:16	202:9	181:25	114:19
48:22,23	209:7		116:5
53:24	221:9	ballpark	118:6
54:7,22	226:22	225:2	133:15
57:1 68:16	227:17	bank 156:3,	142:4
69:25 70:9	228:19	8,10	143:12
71:19,20,	backfill	banks 56:25	144:25
24,25	168:15	57:4,8	145:10,18
72:6,21,	background	156:5	146:13
22,24	39:6 40:11	bar 9:20	184:14
73:6,10,13	58:7,11,	82:19	198:21,24
74:2	17,24	164:20	213:8
75:12,15	59:5,16,17	barber	222:8
			230:20

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: baseline..Bouchard**

231:1	be-all	21:24	231:8	board	185:20
baseline	bear	150:11	benefiting	bodega	99:24
19:21		228:16	178:20	body	
24:17	began	4:1	bid	141:23,25	
basically	beginning		bidding	142:14,15	
19:5,21		4:2 175:12	19:22	143:10	
24:5 45:22		211:25	big	176:1,16	
82:17			86:1		
87:20	begins		136:4	bogged	65:14
112:6,20		113:18	148:15	boggling	7:4
114:15	behalf	4:15,	230:9	bole	97:23
115:16		18,21 6:4	bigger		98:2,10
140:9		7:7 10:1,	136:11,16		232:11
151:24		17 35:7	biggest	bomb	178:5
152:11		220:17	133:9		
155:1		221:7,8,	136:2,5	bonus	215:15
157:6		10,18	176:10	book	21:7
161:3	behavior		183:12		136:18
164:17		154:11	bills	10:16	books 45:23
168:10					166:24
182:14	behavioral	131:13	Bisgaard		
210:21			4:18	bottom	55:11
211:4	behaviors				56:8 127:9
212:10		131:5	bit	30:9	128:2
214:20		178:3	78:2 126:1		139:8
basis			133:1		140:22
17:18	belief	23:5	194:2		144:18
50:25 57:7		136:15	205:25		145:7
81:6 105:9	believed		211:8		148:4
109:8,17		143:18	blast		150:9
115:9			100:20,21		174:4,7
229:3	benchmark	75:14	block	97:9	196:1
Bates					198:19
98:8	benefit		Blue	122:9,	
Bates-stamped		114:14		15,17,18,	Bouchard
97:4		226:25		20 123:1,	4:13,14
bathroom		228:3		3,5,7	5:11,13
113:11		230:14,16		132:25	6:2 7:6,9,

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: bouncer..burglars**

19, 22 8:24	133:3	154:17	148:24
9:7 22:1	134:22	box 191:9	158:5
27:2, 20, 25	138:5	brain 24:14	Brown 78:22
28:8, 15, 18	142:19	brand 208:14	brush 75:21
29:14, 19	144:17	brawl 164:20	buckets
35:2, 16	146:5, 18		157:25
36:14	149:12	break 8:18,	build 178:11
37:6, 24	163:18	21 9:3	
38:3, 7	169:17, 23	52:21	builder
48:18	172:15	63:17 70:4	187:4
58:19	173:20	102:1	building
60:15	174:2	103:22	17:7, 8
61:23 65:5	179:23	104:11	178:5
66:17	182:6, 16	169:19	181:9
67:16 68:1	183:17	173:1	195:7
70:3, 10	185:10	174:25	
84:10 85:5	187:23	218:1, 5	buildings
86:5 90:14	188:5	230:5	17:3, 6, 19
92:10	189:17	breezeways	45:13, 14
93:1, 10	191:12	71:10	54:5, 6
95:7 97:1	193:1	76:24 90:1	bulk 17:25
99:15	200:16	briefly 5:13	18:8
102:2, 23	213:18	227:19	bull 169:8
103:9, 21	217:23	bring 222:19	bullet
104:6	218:6	Brisbois	147:11
105:1	223:18	4:18 7:8	149:15
106:9	226:8	broad 75:21	bunch 116:2
112:22	227:11, 18	118:14	119:20, 21
114:11	232:1	broader	133:23
115:8	233:16, 19	111:7	143:3
119:6	234:5, 9,	135:2	218:14
120:15	12, 22, 25	bounced	burglaries
121:4	235:5, 10,	211:18, 21	51:17 66:2
122:1, 24	14, 16	brothers	174:24
126:18	bouncer	broken	burglars
127:2	164:20		
131:21	boundaries		
132:13			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: bus..case

199:19	195:16	calming	car	71:8
bus 160:11	called 13:9	128:23		76:6
bushes 90:3	16:22 17:2	camera		89:10,20
	19:2,3	141:23		91:25 92:1
business	44:3 82:2	142:1,14,		111:10
10:7 22:12	115:14	15 196:6		143:3
123:6	149:19	197:18		153:15
209:8	151:8	208:12,13	card	59:10
busy 187:18	152:9	209:13	care	35:25
196:17	153:3,8			36:2,4
buyer 25:14,	155:12			56:6
22 26:1	161:8,9,19	91:11		136:23
bypass 8:13	168:23	95:20 96:4		
	177:14	137:4		202:2,11,
bystanders	187:10,19	143:10		12,16,18
153:25	193:4	182:8		203:2,6
154:1	197:12	187:5		205:14,17
<hr/>	<hr/>	196:25		career
	201:23	197:5,15,		194:25
	205:5	17 198:7,		220:6
	210:3	8,16		
C.D. 171:13	calling	208:14	carjackings	
205:11	84:16			163:23
Caitlin	116:7	Cameron 4:17	cars	82:24
190:11	161:24			92:1
calendar	167:22	campaign	case	6:4,6,
173:14	calls 57:3	121:6		7 7:2,4
	106:24	122:9,15,		16:14
call 9:1	165:2,6,9,	18,21		26:8,11
15:7,17	13,17,19	123:1,3,5,		31:16
44:15	166:1,3,12	7 132:25		
78:21	167:10,16,	capability		33:12 35:8
79:13	21,24	225:13		39:3 42:7
144:9	168:2,9,	capacity		43:1 57:21
154:3	17,22	223:1		59:25
156:8	169:3,5,6,	224:14		63:25
168:5,6,7,	8 171:19	captioned		64:14 69:2
8 174:5	172:2	6:16		79:17
194:11				86:21

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: cases..check-ins

89:19	170:20	217:19	change	48:10
94:14	206:10,24	Center/polaris	118:19	
110:16	209:21	127:5	190:5	
114:23,24	210:11,17	centers	53:8	changed
117:7,8,23	213:13	199:16	126:1	
118:3	216:25	central	200:17	
123:22	220:8,20,	209:14	206:18	
125:17	25 221:3,			
140:15	11 235:3	certification	46:18	changing
145:18	cash 29:6	19:1 21:10	189:19	
147:3,5	85:7	23:13,17	190:7,25	
155:2	126:6,8,	24:3 26:20	191:10	
157:19	11,12	certifications	chapter 19:7	
162:1	133:21	22:18		
163:13	144:6	Certified	characteristic	
167:24	158:6	18:24 24:2	s 160:24	
168:14,22	182:10	challenges	161:1	
169:13	categories	108:4,19	162:9	
187:25	211:19	109:11	characterize	
194:7	category	challenging	86:23	
200:7	151:11	96:10	charge 15:24	
202:20	catering	109:12	chat 78:11	
206:10	125:5,19	163:25	100:21	
214:8	cats 169:7	195:8	check 58:7,	
219:10	causing	Chameeka	17,24	
220:10,18	199:19	143:7	59:18	
221:12,15,	cell 83:1	Chaneyfield	68:8,14	
19	187:15	221:23,25	84:24 85:3	
cases 4:19	204:24	222:11,23	95:3	
5:18 6:12,	center	223:7,8	99:23,25	
16,17 7:4	189:23	224:8	191:9	
32:22	197:18	Chaneyfield's	check-in	
38:25 85:2	199:23,25	226:17	139:7	
91:3,16,21	200:1	227:7,23	check-ins	
140:20	209:14		139:5	
151:2				
157:19,25				
160:20				

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: checkout..collecting

checkout	cited	124:19	167:6	208:17
155:7		206:23,24	clarifying	226:5
checks	cites	108:10	218:20	client's
58:11		48:20	clarity	20:7
59:5		50:7 52:24	class	217:11
67:18,20		99:24	clients	19:24
68:2 83:25		170:16	classes	19:6 20:10,11
84:7,12,		192:5	classification	50:15 55:3
18,22		202:4	s	223:23 56:11 59:5
			224:6	132:24
chief			clean	133:5,8
119:15,25	civil	7:12,		135:10,20
chiefs		13,18	cleaning	175:5
119:17		220:17		190:22
		221:18	94:9	
children			cleans	196:23
159:25	claim	7:20		
189:23		10:15	clear	164:20
217:20			42:19	
	claiming		58:21	clubs
choose		31:25		88:20
158:20			coauthored	
	claims	91:6	80:9,25	57:2
chose		223:5		
27:21			83:23	Cockbain's
28:23			122:17	
29:16	clamoring		129:24	136:17
176:2		160:1		
	clandestine		141:9	code
church		154:7	159:22	15:22
163:6			207:4	69:20
		90:17,22		184:14,16,
		91:17		
	clarification			
circle		41:12	clerk	21 195:17
152:6,7			205:19	215:16
circumstance		110:19	clerks	82:19
96:5		127:1	client	10:1, cognizant
101:13		151:15		2,18 20:19 160:4
circumstances	clarified		25:16	colleague
68:13		67:9	26:9,14	121:9
215:8			47:1 52:4	
	clarify			collecting
cite		110:20	135:9,11	
126:20			138:1,2	178:6
229:2		129:3		
			188:4	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: collects..concluded**

collects	communicated	162:8	106:17
105:22	81:7	166:4	concealed
colored	communicates	217:6	111:11
112:13	100:16	compared	concealment
comfortable	communicating	64:13,15	71:7,9
8:14 37:14	100:15,22	160:23	76:1,9
100:23	communication	compelled	91:24 92:3
101:22	145:4	175:25	205:3
128:20	204:22	176:15	concept
commercial	communications	competency	111:7
16:9 52:11	81:13	23:15	218:12
54:5 89:7	community	complaints	conceptual
200:18,24	154:10	32:1 36:11	50:18
Commission	companies	229:18	conceptually
13:9,10	81:25 86:2	completed	198:15
commissioned	192:12	42:7	concern 36:2
201:20	196:24	226:10	51:9,15
committed	company	completely	52:25 53:4
207:16	10:4,8	77:14	66:13,19
committee	17:2,14,16	complex 59:1	103:18
166:17,20	18:5 68:8	156:9,13	107:22
common 77:3	84:24	complexes	177:23
81:20	191:24	51:7	concerned
88:23	208:10,13	compliance	51:17 59:7
89:15,21,	221:8,11	17:12,13	65:10,11
22,24 90:6	224:13,15	component	66:1,3,4
91:7 100:4	company's	136:2	136:2
120:13	17:1	158:13,14,	168:8
125:13	comparative	25 214:11	concerns
154:24	160:22	components	44:5 47:1,
159:1,5	comparatively	211:22	2,9 51:13
186:17	24:25	Comprehensive	59:16
communicate	compare 40:3	127:6	135:24
100:24	160:24	computer	concluded
130:15			34:19

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: concludes..consulting**

235:25	167:17	98:8	58:10
concludes	186:16	consent	64:23
232:1	203:15,19	159:23	66:22
conclusion	conference	consideration	120:6
145:13	19:8	52:10,19	135:12
conclusions	conferences	54:19	138:2
47:17,20	12:11	considered	186:10,25
conduct	confidentialit	58:3	191:14
20:4,22	y 6:11	116:25	196:20
50:16 53:4	confines	117:1	208:3,5,6,
58:11,17	18:17	177:21,25	8,21 209:1
59:5	178:9	180:24	210:19,20,
83:18,25	confirm 6:25	181:14	21 211:4,
84:7,12	37:18 40:3	182:7,24	25 212:11,
106:11	167:13	183:8	12 213:2
108:6	194:13	191:16	consultants
120:24			24:5 25:13
128:19	confirmed	consist	187:17
130:8	7:6	17:21 88:9	193:21
187:12	confirming	consisted	207:18,22
188:11	180:7	71:2 75:18	210:2,16
191:15	confusing	consistency	211:11,23
203:21	143:6	209:21	212:7,8,22
213:25		consistent	213:7
226:3	Congress		consultants'
	201:21	199:13	210:4
conducted		consists	consulting
34:23 47:7	connected	88:8	11:6,9,17
52:9 54:17	201:10	constitutes	13:23 14:2
67:20	connecting	115:12	20:15 24:7
75:16	232:24		26:9 50:13
185:12,25	connection	consultant	53:7,8,13
	15:9 65:24	10:14	134:15
conducting	102:19,21	21:14,17	135:20
18:3 21:5	103:7	22:4,24	189:25
51:14		24:3 25:24	208:11
59:17	consecutive	56:12	225:22
70:21			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: contained..counsel's

contained	control	17:2	copyright	154:9
33:11 34:5	115:19		128:5	correctly
70:19	116:1		core 22:17	18:19 87:6
154:16	117:1		209:15	95:10
contemporaneou	154:19		corner 150:9	162:8
sly 144:21,	156:2,12,			167:1
24	23 157:3		corporate	189:2
	161:16		86:1 117:7	
contents	170:19 , 23		correct	correlate
40:5, 25			5:22,23,25	103:19
127:21	controlled		8:11 9:10	119:24, 25
	115:11		11:14 28:7	correlation
context	controller		30:17,18	104:22
172:8	153:4		31:2,3	105:3,12
224:8	155:22,23		32:17	107:13,15
continually	156:11,15,		33:13	119:19
135:19	22 157:6		41:11	168:4
continuation	170:14		43:5,6	174:20
230:19	controllers		55:15	175:2,11
231:9, 14	153:5,9		56:12 64:6	176:8
continue	156:7		77:7 78:3,	cost 96:8
148:8	controls		6 84:19	197:14
157:23	154:6		108:2	counsel 4:10
contract	convene		129:9	6:17,20
17:12, 16	101:5		150:24	7:2,3,16
contracted	converge		162:18	33:4 36:7
63:1	152:24		166:6	190:9
contracts	copies		173:11	206:5,6
18:7	37:12,13		176:4	217:3
contrary	38:9		179:4	219:3
193:16	cops 81:16		184:23	222:16
contributed	164:5		191:17	223:20
161:14	copy 68:11		213:12, 23	231:20
contributing	100:8		218:10	235:2
161:21	217:4		222:13	counsel's
	235:20		224:22	21:21
			corrections	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Index: count..crime

count	61:17	22:20 23:4	creating	149:19
	96:12	45:10 76:5	113:5	150:23
	137:7,17	210:5	130:13	151:7
		211:12	credential	152:1,10,
counting		218:22,25		11,15,21,
	137:13	219:2	19:16	25 153:2,
country			207:25	13,14
	136:8,10	courtroom	credibility	155:19
		35:12	32:13	156:11,17,
counts	51:24	courts	35:4,9,13	23 157:11,
county	69:20	cousin	credible	15 160:21
	85:3 94:20		32:4,7,9,	161:3,10,
	97:10	cover	12	11,13,16,
	106:19	coverage		25 162:1,
	140:25		credit	21 163:9,
	148:7	228:12	59:10	20,25
	149:4,8,9	covered	crime	164:4,24
	156:16,21	56:21	13:19	165:6,17
	162:3	COVID	14:5	166:1
	167:25	76:21	18:12,13,	168:5
	170:23,25	CPP	14,17	169:1,3
	171:18	18:20,	22:15	170:19,23
	172:1	23,24	39:11,14,	173:4,8
	185:21	19:16,23	15 40:13	180:1,5,10
County's		20:7,9,12,	44:9 45:3	184:19,22
	162:12	16,21,25	47:4 49:16	190:16,18
couple	42:24	21:2,9,13,	51:10,12	191:5
	50:14	22 23:13,	57:4,6	198:1
	74:4,12	17 25:10	81:23	199:4,9,16
	77:13	26:21	85:21	200:4,22
	78:15,16	187:22	86:17	201:6,21,
	102:3	Craig's	87:24	24 202:3,
	196:9	31:12	90:17,22	5,6,12
	217:21	crazy	91:17	214:23
court	4:8,11	128:15	105:6	215:14
	6:10 9:1,	create	109:20,22	218:12,13
	25 10:5,	128:22	117:3,4	224:17
	17,24	130:9	140:8	
			147:7	
			148:5,12	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: crimes..day

crimes	criminology	44:12	dark	72:1
13:14,22	114:23	114:20	Darrell	
14:3 48:1	118:16	190:24		221:23
49:5,7	151:12		customers	
59:17	160:14	56:10 89:8	data	44:12,
81:24		135:10		14,15,16,
147:21	criteria			17 47:4
162:15,17	68:7	cut	51:5	
163:15,16	critical	115:3		105:23
165:3	23:6	173:17		106:2
171:13	cross-	cv		107:1
174:5,14,	examination	13:15		148:6
21 175:2,	7:15 232:7	22:5		162:3
8,11,15,		120:24		165:8,14
16,22	cross-noticed	217:4,6,7,		169:9,10
176:1,2,5,	6:5	8 224:4		173:13
9,11,12,	cross-notices		D	177:22
13,18,23	7:11			
178:10,13	crossroads	d/b/a	214:13	
214:25	132:8	4:22		219:4,5,6
219:14	CSA	DA		
criminal	200:23	16:5	datapoints	
13:7,14	CSC	DA's	201:2	
16:4 22:7,	18:20	15:23		
9 59:17	23:25 24:2	dailies	date	4:5
68:14	25:9,20,	146:16		42:9 171:5
84:7,8	21,24	daily		173:15
121:19	26:6,19,22	80:23		189:18
151:21	211:20	81:6 82:8		
203:15	culminates	damages	dated	38:9
criminals	46:11	36:16		42:8
126:11	culminating	Dana		98:17,20
149:11	113:9	4:20		206:8,9
152:4	culture	7:6 8:25		
	100:25	78:22	David	4:13
criminologists	cup	232:4		5:13 28:14
201:16	112:13	233:23		114:9
	current	dangerous	day	60:24
		164:19,23		61:7
		dangers		70:21,25
		160:4		71:3,23
				73:17

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: day-to-day..demonstrate

75:16 , 22 ,	dealt	10:6	deemed	7:2	193:13
24 78:12	dean		deeming		define
80:2		151:18 , 20		223:9	131:12
196:18				223:9	180:1
199:4	dearth	49:13		224:10 , 12	
200:18		177:22			defined
210:25	death	176:25	deems	25:16	154:15 , 17
217:6		177:3	deep	44:13	definition
225:20	deaths	177:5		161:11	113:25
day-to-day	Decatur	8:2		162:1	114:1
208:24				200:3	140:4
days 61:13 ,	December		deeper		180:5 , 8
19 94:15		141:11		186:25	definitions
95:2 , 3	deception			214:21	140:8
164:6		86:19 , 20 ,		231:11	definitively
204:20		24	defendant		33:5
De 140:25	decide	176:6		4:22 34:17	degree 9:16
170:25	decided			36:9	12:14 13:6
171:9		176:4		220:4 , 17	22:7 , 9
172:10 , 19	decision			221:4 , 11 ,	
dead 177:8		15:24		13	degrees
deadline		16:5 , 7			203:16
226:14		21:20 , 21 ,	defendants		
231:18		22 25:25		6:17	Dekalb 69:20
deadline's		26:10		202:16	94:20
226:20		36:12	defense		106:19
		216:10		21:21 33:4	147:13
deadlines	decisions			36:6	148:7
230:15		179:3		210:24	149:4 , 8
deal 101:12		186:6		220:6	156:16 , 21
148:2		187:3	defer	21:19	162:3 , 11
205:20	decrease			167:25	
206:21		184:18 , 22		142:20	170:23
dealing				145:15 , 19	171:17
15:20 , 21	deem	210:23		146:9 , 15	172:1
101:1		224:11		147:1	
			demonstrate		
				179:1 , 10 ,	23:7
				17 184:10	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: demonstrated..developing

demonstrated	118:14, 21	220:14	detect	91:18
23:14	167:22	derived	92:4 93:19	
demonstrates	168:3	227:6	95:9, 12	
24:5	deploy	describe	96:6	
demonstrating	109:25	209:17	Detective	68:18
26:22	depose 54:10	describing	deter	164:4
dental	deposed 8:11	15:10, 15	determination	
133:13	deposition	188:13	15:23 35:9	
department	4:3 6:3, 19	designated	186:22	
16:18	7:9, 10	202:4	determinations	
44:12 53:2	8:14 60:9,	219:21, 23	35:4	
121:6	10, 19	220:3, 9	determine	
122:3, 6, 12	61:16	221:10, 12	15:18	
132:4	85:10	designates	81:12	
140:25	92:17	211:13	110:1	
143:9, 16	99:11	designation	195:3	
147:13	145:12	211:20	determined	
148:20	171:8, 14	designations	183:24	
150:13	172:4	220:5, 11	deterrant	
161:10	178:24	desk 45:16	154:2	
168:21	181:4	60:25	deterring	
170:17, 21,	183:20	63:10	163:24	
25 171:9,	222:17	65:14, 22	Detroit	
18 172:2,	227:7	66:7	197:13	
10, 13, 16,	228:1, 4, 14	76:10, 12,	develop	
19 204:3	230:18, 19,	24 100:1	119:21	
205:6	20, 22, 23	193:24	developed	
departments	231:7, 9, 13	195:17	49:4, 6	
122:11	234:21	204:23	55:7 56:1	
depending	235:6	detail	151:13	
30:22	depositions	182:20	204:7	
169:4	8:16 69:7	214:16	developing	
203:16	92:21, 23	detained	209:22	
	93:13	140:25		
depends 20:7	116:19			
65:25 66:8	171:17, 21			
68:4 77:11				

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: development..document**

development	93:18,21,	229:14,23	dispatchers
147:19	22 95:9,11	disclosures	197:19
153:8	108:23	226:15	disposal
155:12,15	109:5	disconcerting	87:15
	130:20	135:7	disputing
deviate	162:16	194:2	156:19
216:23			
DHS	difficulties	discovery	distance
16:20	109:13	34:19,23	195:6
119:2,8		42:6,12,	distinct
121:16,18	difficulty	20,25	86:20
122:22	66:24 67:5	54:16	distinction
123:1	dig 231:11	57:21	91:13
131:15		63:25	122:25
die	digits	64:3,9,14	176:6
177:6	194:13	69:1,8	210:18
differ	diminish	79:16	distinguish
80:18	21:10	92:12	45:20
	186:21	145:11	175:19
difference	direct 5:10	discretion	distinguished
39:4	107:13	213:3	176:21
40:17,21,	126:19	discuss	distortion
23,25 41:4	168:4	209:8	25:3 115:2
81:15		discussed	dive 44:13
131:25	130:14	56:20	161:11
132:17	directly	138:11	162:1
198:5	16:20	185:22	200:3
206:17	73:19 81:8	192:3	divergence
	84:15	discussion	35:5
differences	121:13	215:16	
38:24	157:18,24	dispatch	DNRS 100:1
39:24 40:8		197:18,22	document
41:22,24,	disagree	198:12	62:11 97:5
25 42:2	23:22,24	dispatcher	98:10
82:4	227:4	197:21	116:15
differently	228:6,12		127:21
213:8			
difficult			
90:24			
91:9,17			
92:4			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023Index: documentation..effectiveness

128:5	94:2,5	73:14,15	ECPAT	132:4
166:14	96:2	74:2	Ed	4:8
167:12	101:21	drug	178:5	editions
206:13	137:11,17		181:15,18	21:7
documentation	187:1	drugs	137:2	educate
48:24 58:7	232:16,17,	duly	5:8	135:20
69:10,22	21 233:5	duties	17:21	138:1,2
75:5 84:18	doorbells		35:20	228:22
155:13	187:6	duty	62:25	educating
documented	doors	81:9		136:1
136:7	dots			education
147:23	downtown			22:6 26:23
documents	44:4 48:23			54:13
39:6 57:20	dozen	e.g.	180:13	114:17
69:16	15:11,			208:23
83:25	12	earlier		
105:7	draw	137:5	effect	6:11
116:12,20	134:4	147:25		79:19
217:4,5	210:18	158:12		94:21 95:4
223:19,21,	drive	159:1		229:16
25	8:2	170:15	effective	
	51:13	198:6		117:16
	76:4,5	214:6		118:9
dollars	97:17			158:11
225:8	driver's	217:11		189:19
domains	194:13	225:23		190:7,24
23:15	drivers	232:10		
24:9,12,16	125:20	early	16:25	198:17
domestic	driveway	140:23		203:5
87:21	195:15	141:3,8		206:13
164:3,8	driving	147:19		207:4
203:14	48:15	204:1,5	effectiveness	
Don	51:11	221:13		118:11
78:22	153:15,19	ease	194:1	120:17
door	197:20	easier	96:6	123:12
39:18	drove	109:9,10,		197:5,24
40:23	45:11	12,13,15		198:2
71:11	71:6,13			
76:14				

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: electronic..entirety**

electronic	employee	16:3,14,15	engaging
37:12,13,	83:5,9	22:8 69:20	33:20 73:7
15 137:11	employees	102:25	153:17,21
electronically	58:8,18,25	114:17	156:21
204:9	84:1,4,13	122:8,14,	157:3,4
	85:7	19,22	170:22
element		123:2	191:21,22
152:18,23	employment	128:10	
154:21,22	59:13	130:19	engineering
	67:21	147:20	212:3
elements			
153:1,4	enable	148:2,10	England
155:21,22	enabled	184:17,21	151:22
elicit	156:5	enforcement-	English
33:7	enclosed	type	60:6,14
36:6,7	45:12,13	enforcing	enhancing
178:3		189:7	188:1
elicited	encompass	engage	ensuring
230:12	215:7	120:19	17:11,12
eliciting	encourage	160:9,11	entailed
33:2	111:18	170:18	16:19 48:1
Ella	112:2,25	191:19	entails
	end	engaged	24:1
email	56:15	16:9	enter
97:2,	76:21,22	31:19 66:5	195:17
8,20 98:9,	103:14	134:14	entered
14,16	132:10	135:11	180:12
100:20	170:11	160:7	entering
102:14	194:11	190:1	95:21,24
emergency	end-all	191:15	96:13
168:24	21:24	192:6,12	198:11
emphasis	ended	200:10	entire
219:20	230:24	211:5	136:8,9
emphasizes	enforced	engagement	entirety
114:18	188:16,18	31:16 66:1	71:5 79:2
employ	enforcement	engages	141:25
67:6	12:25	120:6	166:7
employed	13:3,8,10,	160:5	
11:7,11	12 14:5,10		

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: entitled..excerpt**

entitled	Eric	197:3	eventually	114:1,15
178:16		essence	17:16	115:10
entity	16:22	114:17	everybody's	117:15,25
entrance		155:10	100:14	118:10
76:11		establish	everyday	119:7,11
entry	195:6,	22:23 56:5	152:1,2	124:10,18
16 217:13		established	evidence	125:1,11
environment		68:7	34:24	133:10,17
55:9,18		207:20	114:22,23	134:6
56:3 108:5		establishing	115:12,14,	217:12
109:3		207:16	15 116:4,	229:2
110:9,10,		estimate	7,22	exact 219:21
23,24		225:2	117:24	exam 9:20
111:13		et al 4:5	118:25	25:5
128:19,20,		ethics 24:17	121:11	examination
23 130:7,		evaluate	124:7	5:10 113:8
10 131:14		15:1 51:1,	135:6	130:8,22
134:8		142:5,21	145:16,22,	226:11
environmental		186:4	23 146:1,	233:18
151:11		evaluated	2,10	examinations
environments		170:12,21	170:12,21	108:6
51:4,6		172:9,18	examined 5:8	
55:8,13,17		174:19	examples	
88:22		178:19	47:19	
108:20		evaluating	179:1,10,	188:18,19,
109:11,14,		44:9 45:25	14,17,21	21,23
16 129:17		214:22	184:5,10	excel 24:19
130:11,21		evaluation	185:24	excellence
192:10		46:6	188:17	23:18
envision		133:16	189:6	
48:14		210:10	193:14	excellent
Epstein		215:20	203:13	78:19
156:4		events 31:25	229:3	exception
		49:25	evidence-based	134:13
equipment		176:20	48:6,25	
216:18			113:19	excerpt

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: excerpts..expert

222:17	126:15,17,	147:12	expect	68:3
223:12	20,25	150:17		82:6 129:7
224:8	127:4,10	160:20		159:17
excerpts	128:18	162:15		205:14
230:25	129:5,14	170:10	expectation	
	138:8,9	171:21		93:25
excluded	139:9,21	174:12		
218:21	140:23	177:16	expectations	
exclusive	144:19	179:25		137:25
130:14	147:10	180:22	expecting	
216:10	149:16	184:8		234:24
exclusively	150:4,15	193:3	expensive	
18:16	160:13	194:15		195:22
	162:13	196:2		
excuse	83:19	201:5	experience	
152:8	165:1,4	205:24		8:16 11:15
164:17	169:25	233:25		22:10
206:6	170:3	235:8		26:23
	173:3,6			
exercise	174:4,8,13			43:11 50:8
159:17	177:10,12	exist	31:18	54:12
	178:16		115:20,22	199:3
exhausted	179:6,25		123:25	212:23
50:4,5	184:3		136:18	213:3
			187:17	
exhibit	193:2		experienced	
37:21,23,	198:19			66:20 67:4
25 38:2,4,	202:15	existed	31:5	204:15
6 40:6	232:11		64:8 95:15	
41:19 42:5	235:7	existence		experiences
43:9 46:16			109:23	213:9
55:5,25	exhibits			
57:9 69:6	38:19	existing		expert 10:25
70:17,19	57:16 58:6			11:2,18
86:7,9	70:19 79:3			12:18 14:9
96:21,24	86:8			18:10,12,
97:2,4	92:15,17,			15 22:11
104:11,13	23 93:12	exists	137:7	23:9,11
107:17	107:18		146:14	32:18,22,
113:17	138:10	expanded		25 35:12
	140:3		114:17	37:7,20,24

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: expertise..fact

38:3 59:20	explain	explore	95:13
62:14	24:13	114:14	193:18
121:18	95:11	explored	197:25
127:14	135:19	183:21	extremely
128:2	151:3	expressed	195:22
159:15	164:1	51:13	eye 25:14 , 25
173:2	175:4	extended	eyes 22:25
210:4,19 , 23 211:2 , 12 213:14 , 19,23	201:11 214:15 explained 44:5 84:21	138:20 139:6 204:4	eyewitness 31:25
216:12	186:5	extensive	
218:8,17 , 19 219:22	194:7	22:10	F
220:3,16 , 25 221:4 , 10,17	explanation 175:24	extensively 21:6 22:13,14 , 15 166:24	faces 198:10 facial 95:20 96:3 137:4 198:7,8
222:2,4,9	112:7,11 , 15 113:4 ,	extent	
223:2,9	12 181:1,3	140:18	facilities
224:10,11 , 12,14,18 , 20 225:4 , 15,21	explicitly 189:8 191:3 221:24	147:9 154:2 177:20 182:17 227:4	50:11 85:25 111:18 199:13 203:6
226:13,14 , 19,21	exploitation 86:11,14 87:6,12,17	228:2 231:23	facility 205:4
expertise	88:4,14	exterior	fact 18:2
54:12	89:1,9,13 , 14,15	150:19 154:21,24	26:20 33:17
186:15	90:5,13,23	extra 67:10	34:16 35:8
212:23	110:13,15 , 22,25	extramarital 178:4	124:14 136:16
213:3	111:1,6,7	extraordinarily 187:18	145:9 146:8,9,21 160:6
experts	Exploited 189:23 217:20	extreme	163:9

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: factor..find

164:11	227:25	75:4	file	68:12
179:2	fake	233:8	federal	7:12
187:22	fall	33:7		16:22
193:12				17:3,5,6,
196:8	falls	218:14		7,19
207:20	familiar			121:15
208:25		31:4,8		122:7,14,
factor				20,22
204:13		70:15		123:1
facts	146:24	92:15,22	feel	72:7,
		93:2,11		25 165:22
factually		94:7,20,25		166:7
33:24		97:20 98:4	fell	229:4
91:21 92:8		111:20		files 92:18
223:3		113:22		106:16
fail	19:10	145:25	Felson	116:14
68:9		161:6		147:23
failed		163:12		filter
229:10		170:6	felt	175:25
		172:5		175:14
failing		188:12		final 168:7,
229:5		207:11	fencing	8
fair	8:22	222:18,20,	fewer	147:24
17:23		21 234:13	fiduciary	finals
20:13 26:2	fancy	153:15		222:16
28:5 32:1,				financial
2 42:2,3	fascinating	185:3		56:23
55:14			field	178:20
77:2,4	FBI	53:1		financially
79:8,9		105:23		4:14
147:5		106:4,16	fighting	67:10 96:2
162:9		140:7		113:12
231:24		147:14,23		115:1
fairly	19:13	148:20	figure	137:12
120:13		149:9		170:20
fairness		FBI's 105:6		174:20
206:16		features		175:1,11

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: finder..form

185:7	214:7	109:2	150:8
198:13	fixture	202:22	165:15,20
202:23	76:10	203:9	166:5,8,
finder 35:8	flagged	FOIA 119:2	14,18,20
179:3	41:14	121:10,14, 16	167:1,4,7, 11,15
finding	flags 118:24	folio 188:25	173:12
174:22	119:21	folks 84:6,8	206:1,7, 10,13
findings	124:3,5,23	112:17	209:18,19
48:20	125:21	120:8	210:3,16,
114:19	131:10,12,	158:7,8	19,20
123:19	13,18	190:15	211:4,11
216:20	132:3,6,9, 15 134:17	follow	212:7,8, 14,21,25
fine 7:21	flesh 228:1	188:22	213:6,7
28:17	flip 39:2	216:15	214:17,25
193:16	112:11	229:10	215:3
218:2	113:5	footage	216:23
finish	136:3	141:23	223:24
112:20	fluctuate	142:1,6, 14,15	224:3
114:10	80:14	143:13	foreseeability
finished	flyer 102:22	196:6,21	34:6
148:17	233:1	footnote	foreseeable
finishing	flyers 99:13	166:9,19	34:3
217:25	101:15	167:6	forgive
fire 169:5	203:22	footnotes	77:17
226:5	focus 124:21	55:11	106:4
firearms	192:7,9	108:11,14	189:9
13:11	211:19	forced 89:6	forgotten
firm 4:14	focused	163:10	67:8
5:25 14:2,	55:22	forensic	form 6:21
24 44:3	81:23	21:14,16	28:16
235:23	123:5	22:4,23	34:21
fits 157:24	202:20	24:10 25:7	36:13
five-step	focusing	149:23	194:4
45:24			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: formal..gave

formal	83:18 84:23 187:12	frankly 222:25 fraud 59:10	function 65:23 154:18 196:16	G.w.'s 91:14 92:20 93:13	57:17
format	206:19	free 165:23 166:7	functional 138:17	140:20 234:2	
forms	88:9	226:2 228:21	functioning 155:2,4	gain 67:20	
formula	213:1	frequency 81:12 101:11	fund 156:10,12	Gambrell 4:21	
fortunately	212:16,18	frequently 108:24	funding 121:15 156:2,15	gang 13:14	
forward	155:16	front 10:6 37:8 45:16	furthest 221:16	gaps 46:10, 14	
foster	157:7	60:25 63:10 65:14,22 66:7 71:11	future 96:18 136:24	garbage 168:10 gas 71:17	
found	36:9 37:2 105:22 139:1 181:8 190:12	73:18,19 76:10,12,	gate 79:24 195:9,10, 11,12,15, 18,19,21, 23		
founded	207:8	24 100:1 127:4	G.W. 4:4, 15,19 5:17 27:3 32:4, 21 38:4,20	gates 194:16,18, 23 195:1	
four-page	204:7	190:23 193:23 195:17	39:4,17,21 43:5 86:25 87:4 92:13	202:21	
fourth	46:8 87:14	204:22 206:12	140:4 148:22	203:3	
fraction	224:20	full 6:13 8:22 92:21	158:2 160:20	gathered 143:4	
frame	162:25	116:6 160:14	163:14 173:10,17 213:13	gave 49:15 61:16	
framework	157:11 209:19	230:17 fully 37:4 162:5	233:21 234:6	66:13,20 75:21 124:19	
Franco	4:7	190:1 228:1			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: geared..groups

134:13	Georgia	glad	114:2	181:7
136:17	7:13,18,20	Global	4:9	grant 21:9
142:3	8:2 12:7	globally		granularity
147:21	219:2,11		23:18	214:18
169:15	gig 187:21	goal	164:13	great 26:7
181:3	give 5:3	God	111:14	105:20
182:21	40:19 44:2	gold	18:25	106:1
188:18,21, 23 200:20	47:19		19:18	114:3,4
	49:20	good	4:13,	115:13
geared 148:1	53:22		16 5:12	119:15
gearing	57:24		20:24	157:9
148:2	61:11			168:1
general	92:15,18		26:6,20	greater 65:8
16:24 33:8	95:13 96:1		27:1 31:21	214:16
91:2	106:19		48:16	
116:11	111:19		58:24	Green 197:13
127:18	116:6		59:1,18	Greenspoint
136:20	130:12		70:3 82:7	161:8,19
154:18	133:2		103:21	grew 17:16
163:15	137:24		104:7,8	Grimes 143:7
214:12	140:16		119:1	grocery
218:12	142:2,4		133:25	
	161:5		134:11	153:25
generally	164:1		135:18	ground 8:13
11:22	168:11,20		155:15	
35:23	175:3		174:16	groundskeeper
41:19 45:4	190:8		177:2	61:1 65:10
61:8 88:6	193:19		203:10	groundskeepers
154:22	194:12		204:12	63:12
219:18	214:17			65:15,20
generates	230:7,13,	goods	137:2	
225:3	21	Google		Group
genesis	giving 48:24		74:17,19	224:13,15,
151:8	49:18	GPS	82:20,	21 225:3
geographic	228:18		24 83:1	groups 11:24
154:16	230:24	Grand	178:7	12:12

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: guard..happen

guard	81:19	guesstimate	Guideline	half	15:11
	82:2	148:15	217:15		141:14
	208:10	guest	guidelines		173:10
guardian		41:1 49:20	210:9		200:1
	97:16	91:8,11	guilty		217:5
	150:20	93:23	gun	hallways	181:25
	151:6	94:16	182:4		89:25
	153:6	111:12		hamstrung	
guardians		128:16	guns		57:23
	153:10,11	137:8,9,	181:20,21		142:3
	154:1	12,16	202:21	hand	5:1
	158:2	138:14	203:3		
guardianship		155:9	Gunpoint	handful	
	153:22	158:18	161:9,15,	197:2	
	157:5	159:7,8	17,20	handle	106:1
	159:11	178:8,11,	guy	121:21	
	160:12	14 180:18,	151:13		125:8
		25 181:6	157:3		139:5
guardianships		182:19	197:3		
	163:5	193:4	222:1	handler	
guards	80:2,	202:24	guys	150:19	
	5,23 81:1,	203:21	33:7		151:5
	16 202:21	205:15	157:1,2		153:5
	203:3	229:12	158:9		154:6,8
guess	19:8	guest's	164:20		
	64:2 74:10	94:3	168:14	handlers	
	76:21	guestroom	172:13		151:5
	78:24 87:1	91:10	193:23		158:7,10,
	111:15	guestrooms	209:3,9		11
	123:7	180:12	211:19	handy	20:2
	131:17	guests	212:4,5	Hang	114:9
	148:8	45:17	234:14		
	211:8	188:12		hanging	
	219:15	204:25			200:11
	220:7	guidance	H		
	223:12	63:7	hair	happen	87:22
	228:14	Guide	136:15		96:19
		31:11	haircut		110:8
			111:4		120:5

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: happened..hospitality**

202:3,7,12	107:23	198:10	hit	39:23
happened	108:1,16,	200:10	hold	11:1
18:8 95:25	20 110:9,	hierarchy	18:10,12,	
101:17	23 111:13,	115:14,15	15 26:3,10	
178:12	17 112:20	116:7,8,23	32:21	
	129:17			
happening	130:6	high	85:21	
91:9 169:1	217:18	153:13,14	91:20	
happy 106:5,	hear 35:17	156:17	136:25	
18 132:9	227:24	161:3,13,	holding	
145:19		24 199:21	212:8	
197:12	heard 47:10	201:6	218:18	
230:13	123:8	202:5,6	home	151:22
	196:14	205:19		
hard 118:13	223:10		homeland	
192:25	233:4	high-end	16:18,23	
221:14		175:5	118:24	
228:16	hearing	highest	121:6,23	
	230:16	207:17,21	122:3,7,13	
harder	heavy 53:9	hire 19:25	132:4	
109:17	hedge 219:1	25:23	homes 157:7	
163:15	heels 15:4	58:12	187:1,5,6	
200:21	112:16	186:10,24	honest	
hate 163:21	held 86:1	210:25	169:12	
220:7	140:13	hired 14:24	hope 88:2	
hated 206:19	helped	64:23	109:10	
	121:10	hiring 18:6	110:6	
head 49:12	helpful	26:8 186:3	111:14	
171:23	166:6		157:15	
199:22	helps 154:14	historically		
heading		154:7	hospitality	
199:23	hey 20:19	history 17:1	11:4,7,10,	
	95:23	24:15	11,23	
headquarters		39:14	12:2,7,11	
19:8	113:10	51:10,12	56:2,4,5	
	156:22	59:10	59:4	
healthcare	157:2	133:12	109:2,3,5	
50:23	186:23,24	214:23	110:9,23	
55:9,13,				
18,23 56:7				

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: hospitals..hourly

120:18	69:10,14,	193:20	95:16 99:3
123:11,15	17 71:19	194:1	108:18
124:2,22,	77:3,10,14	198:11,25	117:15
25 125:22	82:15	199:5	118:9
128:9,12,	84:5,15	200:19	120:8,10,
14 129:8,	85:13	201:24	11 129:19
10 134:2,8	87:5,25	205:20	131:25
191:14	88:17,24	220:17	132:2
192:10,11	89:15,24	221:4,12,	138:20,22
hospitals	90:6 94:4,	13 228:9,	143:19
53:7	8 95:10,	23 229:11	159:16
120:23	17,21	233:4,10	162:8
129:2	98:13	hotel's	175:5
	100:12	102:6	177:6
hosted	19:2,	103:2	189:13
7 24:3	102:8	196:5	191:16
hot	162:4	hotel-type	192:12,19
	197:15,21	103:1,3	194:2
hotel	19 108:9	104:17,18,	203:7
7:25	110:18	19 108:9	
8:5 11:8,	111:12	hotels	205:14
12,15,19	112:17	15:1	221:1
12:4	113:14	30:22	
44:23,24	130:17,24	43:19,24	hotline
45:8 47:3,	134:12,14,	44:10,13,	105:24
8,19 50:19	17,18	20 45:2,9	106:24
51:14	135:9,11	46:19	112:10
52:9,22	138:11,15,	47:2,21	118:19
59:21,22,	18 139:11	48:2,8	
23 60:1,4,	155:3	49:22	hour 48:8
5,22 61:7,	158:21	50:16,24,	95:25
9 63:1,2,	167:18	25 51:3,6	96:14
5,24 64:6,	171:10	52:17,19	125:3
17,23	172:20	53:11,16	133:22
65:1,7,11	182:1	54:6,18	134:12
66:10,13,	188:2,10,	55:22	225:20
22,24,25	15 189:12	56:14,19	hourly 49:9
67:17,21	191:22	58:10	125:3,15,
68:2		71:15 86:4	23 134:25
		93:18	135:7

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

Index: hours..illustrate

192:20	88:6, 8	133:25	37:20
204:17	127:5, 6	153:17	43:19, 24
hours 74:4,	136:19	190:21	45:25
5, 12	147:14	219:25	46:23
78:15, 17	148:8	ideal 68:10	95:20
80:2	204:6, 8	ideally	108:23
83:10, 15,	217:16	118:4	109:5, 12,
16 139:5, 7	hundred	ideas 119:1	15 114:24
	225:7	identical	121:11
housekeepers	hundreds	38:20, 22,	124:13
60:25	105:8, 11,	23 41:18	129:11, 20
63:10	14 106:23	86:8	130:20
65:12, 13,		107:18	131:23
19, 21	hunkering	138:9	132:1, 3
94:12	88:17	140:2	134:21
233:9	Huseby 4:9	150:16	136:25
housekeeping		162:14	154:14
94:8, 16	I	166:10	157:13, 24
100:8			190:17
155:8	i.e. 203:7		199:10
180:13	IAPSC 149:23	identification	identifying
Houston	165:15, 20	46:2	55:7 56:1
14:25	206:1	108:15	107:22
43:20, 25	207:15, 25	217:16	108:4, 19
44:12	209:2, 5, 18	identified	109:14
48:20 50:8	210:15, 16,	46:18	129:12
161:5, 6, 7,	22 211:3,	101:7	131:1, 8, 9
9 192:6	10, 14	131:4	132:17, 18
HPD 161:9,	212:14, 15,	133:19	149:10
15	25 213:7	144:5	169:2
HR 18:1	216:23	161:12	illegal
	223:2, 20,	162:3	181:19
HR-RELATED	22, 24	190:19	
13:25	224:9	identifies	Illinois
human 18:4	idea 59:18	97:9	193:20
42:23	61:20	156:17	illustrate
87:10	101:10	identify	108:4
			113:15

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: imagine..industry

imagine	incident	142:7,8	126:5,10
47:25	31:23	175:25	indicators
101:16	39:6,10,18	176:4,7,	116:3
139:3	40:11 60:3	15,22	119:22
181:17	87:7,9	included	121:7,12
182:12	106:19	176:10,14,	123:13
impact 163:7	135:22	17,19	124:3,6,
	141:24	204:1	18,23
impetus 96:1	144:25	including	125:21,25
	164:3,8	7:14 22:10	126:7
implement	165:8,9	62:18,21	132:3,6,
111:18	173:15	189:7	11,15,18,
117:3,4,20	216:16	211:23	22,23
120:2		incorporated	133:4,7,
133:5,8	incident-based	62:10	11,13,14,
134:7	148:6	74:24 75:7	20,21,23
implemented	incidents	78:5 79:12	134:1,5,17
197:13	44:18	incorrectly	indicia
implementing	86:24 91:8	149:10	119:8,12,
186:7	105:8,10,	increase	18
	11,14,19	184:16,21	
implies	106:22	independence	Indirectly
211:2	136:7,9	208:15	192:4
implying	144:20,22,	independent	individual
131:20	24 147:14,	25:13 62:8	16:8 21:5
importance	23,25	147:6	44:10 45:8
65:9	148:7	187:18	100:25
important	149:9	208:5	138:18
64:25	192:8	209:15	individuals
65:6,23	196:12	212:11	163:11
114:7	199:20	indicating	Industrial
	229:17	52:10,19	19:4 114:5
importantly		53:11	Industries
8:18 208:4	include	54:18	4:4,22
		62:23,24	industry
improving		135:2	11:5,7,10
188:1			
inadequate			
228:7,11			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: informal..install

19:1,19	inherent	17,20	159:2
25:19	177:15,21,	94:14,19	196:2
26:25	25 215:6,8	97:6,16	217:3
58:15 99:2	initial 16:3	99:4 108:1	231:20
114:18,21	168:6	129:19	inside 91:8,
120:18	initially	138:15	10 93:21
124:22	17:4 31:19	139:10	137:14,16
125:22	initials	141:1,9,10	158:13,24
129:8	6:16	143:14	inside/outside
137:23	Inn 4:19,23	144:1,8, 19,22	158:25
207:18,22	5:18 7:24,	145:3,24,	159:4
229:5,8,11	25 8:1,5,7	25 146:8, 9,21	inspect 17:4
informal	27:17,22	148:22	94:15
83:21	28:10,20,	154:20,23	233:10
185:12,15,	24 29:11,	156:21	inspected
24 186:2,6	16 30:6,	157:20	17:11,14,
187:7,9	10,12,14,	158:12	15
200:9	16 31:1,16	159:3,6	inspecting
203:19	33:16,21	160:25	17:18
information	34:3,11,17	162:2,3,8	204:19
49:19	35:7,20	171:1	233:6
65:17	37:2 40:13	172:3,10,	inspection
66:24	57:22 58:8	19 176:25	70:21
82:14	62:16	178:20	71:1,3
100:18	64:14	179:3,8,16	73:2 74:23
117:23	70:13	180:23	75:17,20
165:8,18	71:16	183:18	94:14
166:2	74:23	185:11	147:8
211:23	75:17	187:10,25	153:13
213:8	77:19,24	188:16	225:24,25
227:5,6	78:9	193:12	233:8
informative	79:11,24	194:22	inspections
52:25	80:1,4,22	206:6	216:17
informed	82:13,22	225:24	install
205:19	83:2,4,5, 8,9,18,25	Inn's 69:19	197:14
	85:6,12,	79:19	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: installed..involved**

installed	20:11	17, 24	233:17, 24
194:16, 19	56:22	interventions	invasive
195:1		118:9	108:6
197:15, 16	interesting	120:3, 17	112:16
	194:14		
installing	interior	interview	113:9
91:10	154:21, 24	15:5, 8	130:5, 6, 23
194:23	158:17, 19	34:22	investigate
instance	159:7	59:21, 23	171:13
142:16	intermittent	60:1, 10	183:1
165:2	139:10	61:16, 21,	investigated
instances	internal	24, 25	13:19 14:5
84:25	123:22	62:5, 9	148:20
110:16, 17		63:5 67:12	investigation
174:22	International	68:18, 19	18:1, 3
	19:3 24:4	78:4, 8, 9,	
institutions	119:16	16 79:3, 15	147:7
56:23	180:9	83:24	investigations
instructions	210:1	99:12	13:25 84:9
112:7	217:12, 17	147:8	203:16
113:13	internet	181:4	208:7
intend	35:19	182:15, 23	209:3
42:11	31:5		226:3
146:7	106:11	interviewed	
231:7	internship	14:18	investigator
	22:13	15:13 16:8	14:1 97:8
intended	interrogate	44:21, 23	invoice 74:7
47:16		59:24	
231:17	137:11	68:20	invoices
intending	intervene	77:23	233:21
35:11	164:15, 18,	interviewing	234:1, 14
140:11	23	70:22	235:1
intent	intervention		involved
43:3	117:14	interviews	10:11
135:12	154:10	47:7 59:22	47:21
Intercontinent	157:14	intimately	110:14
al	163:19	222:21	111:2
161:7			
interested	164:2, 13,	introduce	121:13
	4:10		139:24

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: involves..jurisdiction**

140:14	81:9	142:7	20:24
143:11	138:12	143:20,24	60:14
220:24	216:21	144:15,21,	138:1,2
221:3	italicized	24 158:1	journal
223:9	207:7	173:9,18	123:23
involves	items 6:3	213:13	
88:14	180:18,24	214:10	judge 10:6,
112:21	182:18	232:11	22 26:12
involving	183:19	233:21	34:8
144:20,24	203:13	234:6	210:23
215:11	216:16	J.g.'s	211:1,3,6,
220:25		29:10,15	13 218:9,
221:12	iterated	39:5 41:20	16,22,25
	166:22	89:19	219:3,15
irregular	167:3	91:14	judge's 16:6
186:12	itty-bitty	234:2	21:19,22
Islam 29:20	185:8	J.g.]'s 6:8	judgment
32:16 35:7			212:22
186:15	J	J.G.l.	
Islam's	J.G. 4:15,	J.w.]'s 6:6	judgment/
171:17	23 5:17		discretion
issue 6:22	29:1 32:6,	jail 164:17	judgments
18:5 39:8	22 37:21	January	32:14
81:10	38:19	30:15,20	judiciary
101:12	39:8,19,23	70:20	10:20
105:21	40:6 43:9	77:18	
123:24	46:17	141:7,11	July 173:8
156:4	69:24	173:5,8	June 38:10,
176:10	70:14 71:8	177:1	16 42:9,11
178:9	91:5,22	206:12	206:9,15
185:2	97:23,25	207:2	217:7,9
190:20	98:11	Jersey	222:13
192:9	104:12	151:21	jurisdiction
195:4	107:17		167:22,23
205:10	139:22	jewelry	168:3
issues 51:16	140:24	152:14	169:4
	141:18	job 17:1,21	170:17

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: jurisdictions..large**

jurisdictions	kids	200:1	204:18	218:22, 25
168:4, 6	Kikia	28:1,	215:12	
jury	9, 19		219:10	
35:8			224:5	
36:12	148:21			
justice	13:7	kind 17:8,	kindly 4:25	LA 184:17,
22:7, 9	15 18:4, 25			20
53:2	19:18		kinds 55:3	lab 178:11
148:20	21:3, 11		133:14	181:9
150:13	40:3 44:1,	King 29:6		labor 87:12,
151:21	16 68:24	144:6		19 88:9
	71:16, 18	158:6		
		205:11		lack 87:21
	72:15			
	75:13, 21	King's		laid 76:8
Kalb	76:5, 20, 25	171:14		228:20
140:25	78:16	knew 34:11		land 54:3
170:25	82:20, 25	145:1		
171:9	95:14	146:8, 21		language
172:10, 19	99:21	203:17		43:18 50:9
Karim	100:2	222:14		55:24
4:3	101:12	knock 96:2		56:18
5:7 23:3	106:2	109:17		70:18
85:22 93:5		knocking		89:24
142:12		125:8, 25		145:22
		126:9		147:12
Karim's	129:1			165:5, 13,
43:10	132:8	knowing		16:20
	134:3	139:22		166:10, 14,
key	135:3	220:10		18, 19, 25
23:15	146:6	knowledge		167:2, 10,
39:21 41:4	157:11	19:21		14 174:11,
193:23, 24	158:14, 20	23:14		13, 15
204:15	164:4	24:6, 18, 21		177:14, 15
keys	191:21	34:14, 16,		207:8, 11,
194:1	192:23	18, 20		13
Kidd	198:23	143:23	large 54:1	
4:8	201:2	145:24	182:10, 24	
	202:25	147:3	201:24	
		182:18		

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: largest..list

largest	19:4	156:24	205:21	2
Las	168:9	lawsuits	leaving	light 76:10
lasting	92:6	10:10	101:15	191:1
		221:1		197:13
late	183:6		led 73:4 , 7	
	204:5	lawyer 10:1	187:4	lighting
		159:22	205:7	71:22
law	4:14	lay 231:6	232:25	73:2 , 20 , 22
	5:25 7:20	laying	left 217:24	115:23
	9:16 , 18	112:19	legal 35:22	187:5
	11:2 12:25	160:10	154:18	lights 73:1
	13:3 , 7 , 10 ,	182:4	210:5	limitation
	12 14:5 , 9 ,		211:12	219:5 , 6
	24 15:4	layman's	215:12	limited 7:14
	16:2 , 14 , 15	209:17		147:4
	22:8 35:21	layout 76:2	lens 176:17	197:4
	44:2 57:5	228:17	letter	205:3
	102:25		170:24	218:24
	114:17	layperson	171:22 , 24	219:16
	122:7 , 14 ,	190:13		
	19 , 22	learn 77:23	letting 9:5	limiting
	123:2		219:4	128:22
	128:10	learned	level 116:25	
	130:19	79:2 , 10	117:2 , 6 ,	list 31:12
	147:20	189:22	11 , 12	40:2 42:23
	148:1 , 9	220:8	138:19	48:6
	158:16	leased		56:10 , 14
	159:21 , 22	158:18	levels 117:9	61:17
	192:3	159:7	Lewis 4:17	64:2 , 8 , 10 ,
	197:19	leasing	7:7	20 69:2
	210:5	196:24	liability	99:22 , 23 ,
	211:12		179:4	25 100:1 , 2
laws	121:19	leave 73:25		119:4
	164:16	155:7	liable 36:10	127:10
		160:10	37:2	130:1
lawsuit	6:7 ,	179:2	license	168:1
	8 9:23	183:2	194:13	174:5 , 11
	10:4 , 6 , 13	188:20		190:10
	31:20	189:5	life 152:1 ,	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: listed..ludicrous**

205:22	LLC	224:15	long	73:23	65:18
216:8	lobby	113:14		74:13	66:3,6,8
217:14				78:14 92:6	68:5 71:9
listed 13:15	local	19:7		100:22	73:3,19
41:13		122:20,23		102:4	76:1 89:22
57:13 58:4		123:2		103:23	91:22
174:14	located			138:4	92:7,17
177:7		97:16		210:25	104:23
189:8	location		long-haul		107:1
193:22		87:20,22		125:20	108:5
216:16		88:23	longer	95:3	124:7,9
Listen 57:23		117:22	looked	24:8	125:4,16
142:14		118:2,4		39:12	130:5,22
listened		143:17,18		42:21	134:10
46:25 47:2		154:16		45:23	135:25
listening	locations			53:16	137:20
200:12		87:18		71:5,6,21	144:1
lists 63:23		88:1,16		75:25 76:2	153:24
64:5,13, 16,20	lock	117:21		123:24	159:19,21
66:14,20	locks	137:12		124:16	163:4,23
125:25		76:14		138:25	167:6
literally		137:11		225:6	183:6
167:21		158:22	lookout		196:22,23
233:10	lodging	187:1,2		98:3,4	198:4
litigation		12:2,7			212:2
4:9 26:11		50:11	losing		219:25
50:13		123:11,16		195:24	lots 89:20,
209:20	log	84:25	lost	39:21	25
215:11	logs	81:11,		41:4	loud 200:12
live 187:1		12		150:11	loudly 40:22
199:16	loitering			161:17	Louis 153:20
living			lot	193:23	love 190:21
109:20		183:5		15:1	lovely
		197:9		44:19	101:10
		204:21		48:13	ludicrous
				50:15	91:12
				53:25	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: lunch..math

223:10	32:13 35:9	154:4	235:8
lunch 104:3, 8	73:3 82:16 83:12 89:23 M 125:2,4,	155:12 159:2 189:4 91:13 202:24	market 125:17 marketing 23:20 marking 96:20 126:14
14:7 38:15 42:6 125:13 169:14,15 187:3,25 192:20 194:25 204:8 217:8	15,22 130:2 134:10 150:1 179:3 186:22 198:4,14 206:20 208:18 226:11	203:20 211:24 216:18 manager 63:9,11 81:9 150:19 151:5 153:5 154:12	mass 121:2 178:7 massage 88:20 master's 22:9
Magazine 119:16,17	230:6 234:5	155:1,10, 14,25	material 39:3
maintain 68:3	makes 16:5 21:9 90:23	156:2,13 159:4	216:11
maintained 205:22 207:21	109:16 155:8 164:2 174:13 198:15	163:3 198:12 205:19 managers 44:24	materials 34:19,23 40:8 42:15 43:3
maintaining 207:17	making 110:4	186:18	57:10,12 58:3,5
maintenance 65:16 94:17	116:2 122:25 200:11	managing 52:3	59:19 63:25 69:1,9 79:17
major 125:5, 18 206:17	mall 54:4 158:15	manufacturer 209:13	92:12 135:14
majority 41:17	management 22:9 23:19	Marcus 151:13,16	145:11 147:5
make 9:2 15:22 16:3 25:25 26:10	24:10 25:4,6 41:1 45:24 47:4,10	marked 37:22 38:1,5 96:23 126:16	228:7,22 229:6 math 83:12

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: mathematical..met

mathematical	211:4	meeting	memory	39:1
213:1	meant 94:11	48:23	50:4,5	
matter 4:4,	216:9	101:6,16	77:16	
23 37:21,	233:17	183:6	192:17	
25 38:4	measures	202:11	men	183:7
46:17 82:7	46:7 47:7	205:14	mention	
170:1	48:6 79:19	meetings	94:18	
179:14	117:4,5	49:16	222:12	
215:10	118:21	85:21	mentioned	
matters 10:7	185:23	member 11:23	15:17 18:9	
78:6	197:16	12:1 67:10	26:19	
209:20	201:7	139:4,10,	31:17 42:8	
233:21	202:1,8,22	15,19	44:20	
mayor's	203:8	203:24	67:11	
14:25 44:3	215:22	207:25	75:24	
McClelland	216:1	222:24	88:22	
185:18	228:10,12	members	89:20	
189:3	229:16	61:17	90:17	
	mechanism	62:16	121:8	
Mccranie	100:23	66:4,15	133:18	
4:14	media 160:1,	100:7	137:4	
Mcdowell	5 163:13	209:22	153:7	
221:22	medical	210:2,15	155:23	
222:3	12:14,16	211:10,14	158:12	
meaning	112:17	212:14,17,	214:6	
117:3	113:8	19	227:22	
208:13	130:9,21	membership	mentioning	
209:12	133:15	166:21	16:12	
meaningful	medicine	211:18,21	mere 118:18	
169:9	12:19	223:4,23	164:11	
means 23:14	114:16	224:6,7	messages	
24:1 44:9	meet 5:15	Memorial	92:12,20,	
46:3	139:23	8:2,6	22 93:7,11	
164:18,24	202:2	97:17	met 5:13	
205:8	203:5	memorize	44:4 95:22	
208:15	210:9	114:15	202:10,16	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: meth..mitigating

223:6	middle	86:10	162:19	99:13,22
meth 178:11		103:14	190:14	101:3,7,15
181:9		111:17	191:4	102:6,11,
		150:22	minors 27:17	12,19,22,
methodology		169:25	28:10,20	24 103:7,
149:18,19,		170:4	29:11	11,12,19
22,23,25		194:17	33:20	104:16,22,
150:6,8		198:23,24	93:18 95:8	23 107:13
156:20				145:1
165:15,21	midnight		104:17	168:15
166:5,8,		72:3,4,11,	105:3	189:23
14,18		23	107:7,13	203:22
167:1,4,7,	mile	200:1	110:8	217:20
12,15			158:4	
173:12	mind	13:16	159:14,17	232:22,25
		31:14 36:1	183:5,12,	misstating
206:1,7,		40:19	13	52:6
11,13,18,		48:14		
24	209:18,	49:8,10	minus 83:14,	mistaken
19	210:10	50:6 54:4	15	80:16
212:14,21,		67:2 87:9	minute 92:18	92:16
25	213:7,	114:6	165:24	102:16
11,12,22		134:25		121:13
214:16,17,		143:2	minutes	127:22
21,22		166:17	74:13	144:11
215:1,4		209:2	169:18	
216:24		217:11,22	217:24	mistakes
223:24			226:9	130:2
224:1,2,3,	minuscule		227:9,12	misunderstand
4		185:1		136:6
methods	minor	16:10	misidentified	
49:4,6		101:7	108:24	misunderstanding 52:7
50:2		102:6	misnomer	
111:18		103:1	161:4,25	mitigate
129:11		104:16	missed 41:11	134:23
145:4		109:4	missing	192:13
204:22		149:3	69:23	mitigated
MGM 178:7		159:24	97:12	163:2
181:7		160:6,8	98:10,21	mitigating

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: mitigation..necessarily**

43:11	monitored	199:20	197:3
49:4,6	196:14	Mountain	names 6:13
50:10 99:3	monitoring	71:16	144:5
134:16	95:18	mouth 163:13	narrow 63:19
159:16	196:13,20	move 155:16	192:18
mitigation	197:5,6,8,	moved 88:19,	nation's
55:6,17	9,10 198:9	20,21	121:19
mixed-use	202:25	171:25	122:7,14
53:10	209:14		
Mobley 4:17	monitors	movie 136:12	national
235:21,22	197:18	moving 87:24	105:24
modified	month 17:19	88:15,18	106:24
6:15	141:12	multi- 53:10	112:10
	175:6		127:5
modifying	217:11	multiple	148:6
188:1		54:2	189:23
moment 52:8	monthly	142:17	217:19
67:4,13	17:17	143:5,11	nationwide
227:20	months	163:1	105:14
	136:13	murder	106:25
moments		177:3,4,7	147:22
90:18	morale 17:14		214:14
money 31:6	morning	Murrah 17:7	natural
33:21	4:13,16	music 200:12	177:6,9
59:10	5:12,14	myriad	nature 66:1,
85:18	motel 11:12	178:10	8 90:22
208:18	45:14	myths 136:18	214:12
monitor 4:6	motel/hotel		NBI003097
17:3 70:6,	94:21		97:4
8 85:13,18	motels 45:8	N	
96:11	56:14,19		NCMEC 217:19
104:1,4	motions	Naeshia	nearby
173:23,25	220:23	221:22	197:23
190:2	motor 45:10	222:3	199:21
197:1	51:18 66:2	named 12:12	necessarily
198:16	76:5	70:12	19:20
227:14,16		151:13	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: necessity..number

51:19	52:4	183:6	north	161:7	104:16
72:8	73:6	196:16	Northbrook		notion
75:4	80:13	198:25		4:4, 22	110:12
85:1	87:10	205:5	Northwestern		126:11
92:5	123:6	nightly 69:9		197:3	147:18
130:18		nobody's	notable		161:3
144:4		105:20		50:23	185:19
203:3		noise 200:11	notably	55:8	notwithstanding 227:19
necessity		nonemergency	note	8:24	Nova 70:12
23:9		168:25		74:17	November 4:5
needed	42:15	nonmembers		226:12	140:24
43:4	48:10	212:18	noted	91:15	141:8, 10,
233:8		nonsecurity	notes	59:21, 24	11 142:22
nefarious		11:21		61:21, 24	144:8, 25
48:17		nonstranger		62:5, 6, 8	217:13
135:3		162:15, 21		74:14, 22	nowadays
136:25		163:8, 14,		22, 25	73:4, 8
202:25		15		78:4, 5	84:22
negligence		nonverbal		226:10	196:23
7:20		111:19	noteworthy		nuisance
nice	5:14, 15	112:4		174:6, 14	156:24
night	44:25	nonverbally		175:25	number 6:5,
45:15		130:15	notice	6:18	6, 7 22:5
61:2, 4		norm 120:14		69:23	45:2, 25
70:21		184:1		98:14, 20	52:9 53:16
71:1, 20,		193:25		99:6, 17	54:7
21, 25		194:6		100:8, 10,	62:19, 20
72:6, 8, 16,		204:14		13 101:2, 8	65:12, 13,
21, 24		normal		102:13, 25	15, 19, 20,
73:10, 13,		131:20		104:12	21, 22 66:5
20, 21		173:13, 16		215:13	71:12
74:12, 15		193:20		232:15	81:18 93:8
75:16	77:7	233:3, 14	notices	7:10	95:20
83:10	92:6			98:5 102:7	96:13 98:8
138:21					104:16

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: numbered..occurs**

105:5 , 9 ,		117:17	obtained
18 , 21	o	118:12	223:4
106:25		120:12	obvious
113:5	Obie	27:12 ,	
124:14	16	148:21 ,	31:10
137:7 , 14 ,	24	158:4	105:20
17 145:2 , 5	object	28:11	157:21
148:9 , 14		132:7 , 20	199:18
151:8		134:20	
166:19		36:13 93:3	occasionally
168:24 , 25		142:10	126:12
178:3		144:13	209:4
182:24		179:20	occur 78:8
183:2	objection		167:19
194:9 , 19		7:1 , 3	87:17
196:9		21:1 , 18	89:2 , 9 , 10 ,
201:14		26:5 , 18	11 , 13 , 15
211:24		27:19 , 23	90:6
216:8		28:6 , 16	110:17 , 22
223:1		29:12 , 17	111:6 , 9
228:20		35:14 37:3	152:12 , 25
229:4 , 15		47:23	153:2
233:2		58:16 60:7	155:20
numbered		61:14 64:7	178:10 , 13
150:9		65:2 66:16	199:4
216:6		67:1 , 22	200:19
numbers		84:2 , 20	occurred
61:22		85:22	67:12
66:14		90:10	
95:17		91:19	175:15
107:2		92:25	191:4
127:20 , 22		94:23 , 24	192:9
168:21 , 22		99:7 , 9	220:12
185:1 , 9		101:9	occurring
219:17		102:9 , 10	88:18
numerous		103:4 , 15 ,	186:12
89:12		17 104:20	occurs 51:5
		105:17	87:7 , 9 , 18
		112:5	88:4 , 12
			90:21
		73:18	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: October..operator**

October	146:20	18:6 62:25	one-off
98:17, 20,	offered	68:20	101:13
21 141:6,	189:14	80:10, 11	ongoing
10		81:2, 3, 4,	50:25 53:3
odd 138:21	offering	5, 20, 21, 22	55:2
139:2	196:25	82:1, 3, 7,	101:14
	office 14:25	14, 21	
off-duty	17:9 44:4	83:11	online 68:10
81:1, 3, 16,	54:5 66:4	122:8, 14	85:13
21, 22	71:12	141:19	90:9, 12
82:14	73:20	144:7	open 76:20
83:10	76:18, 20,	156:25	90:21
198:13	23 97:10	161:15	137:8, 9, 14
205:2, 18	99:13, 18,	171:12	195:19
offender	20 100:3,	183:16	opened
150:18	6, 18	186:23	137:13, 18
152:20	101:19, 23	197:20, 23	
154:6, 11	151:22	198:20	opening
157:21	158:15, 16	200:13	137:15
163:7	196:15	205:2, 5, 18	149:24, 25
offender's	203:23	208:12	operate
154:5	232:15	officers'	120:10, 11
offenders	officer 13:1	82:24	operation
151:3	14:5	oftentimes	120:8
158:4, 7	16:14, 16	81:25	operational
	61:2, 3	174:23	96:16
offense	62:18 66:6	OGCA 112:9	202:22
44:14	81:6, 19		203:8, 11
86:18	141:1	Oklahoma	
165:8	143:4, 25	17:8	operations
offenses	154:9	on-site 39:9	11:16, 19,
168:1	164:7, 11,	47:6, 10	20, 21
169:16	14, 19	67:10, 12	operative
	169:1		173:3, 4, 7
offensive	198:13	one-bedroom	
222:25		175:6	operator
offer 9:9	officers		57:6 84:15
32:25 35:4	17:5, 11, 19	one-column	
		206:21	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: operators..owners**

operators	230:3	order	6:11	156:3
84:5			19:24,25	158:3
	opinions		24:20 37:1	175:1
opinion	32:21,24		49:20 56:5	
20:23	33:3,6,11			outcomes
25:9,19	35:24 36:1		67:20	
26:3 32:3,	38:18,21,		118:19	
11 33:4,8,	22 117:8		151:7	
14,19	209:22		152:11	
34:1,4,10	213:23		155:19	
35:19	221:22,25		157:9	
36:3,8,15,	222:1		215:20	outer 152:7
18,24 89:1	226:16,23		228:1	outline
91:1,2,20	227:23,24	ordering	230:10	
93:17	229:23			outlined
95:12 99:1	230:4,7,	orders	235:15	223:3
100:12	11,12,13,		81:25	229:13
103:2	17 231:1,		219:8	outset 32:19
104:16	4,11,21,23	ordinance		overreported
107:25			94:21 95:5	105:25
108:21			204:4	overseeing
109:3,8	71:7,10			179:8
112:1	76:1,9	organization		
117:13	152:1		14:16	Overtalking
118:8	157:12,14		100:16,25	218:4
120:1,10	205:3		124:2	overview
122:12		opportunity	126:2	
134:2	54:9 91:24			216:4
138:14,16	99:17	organizations		
140:16	152:21		11:24	owner 10:5
145:10	163:16		12:12	61:11
149:3		oppose	100:19	63:8,11
162:19	226:18		117:19	139:10
167:16			132:5	158:22
202:10		original		159:2,3
213:11	111:13		200:22	203:17
228:6,11,	186:2	opposed		
15,20			originally	owners 12:4
229:4,15	230:1	opposite	152:6	54:1
				139:11
			ostensibly	228:23

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: owns..past

owns	152:16	par	229:7	111:11	166:11,16
		paragraph		parked	168:17
	P	43:8,10, 14,18 49:3		parking	170:14
p.m.	69:11	50:10		45:12	183:15
71:4		55:4,25		66:3,6,8	187:6
72:11,15,		56:8,9		71:9 73:19	191:13,16
18 80:6,14		86:10,16		76:1	209:15
82:15		88:3,25		89:20,21,	216:6
83:6,13		90:15		25 91:22	223:6,21
104:3,5		108:10,12,		92:7 144:1	230:23
173:23,24		21 111:17,		153:24	231:2
174:1		20,23		163:23	participants
200:14		113:16,18,		183:6	128:9
227:14,15,		22 118:22		194:20	participated
17 235:18,		160:14,19		195:24	78:18
25		163:22	parlors		participation
package		169:25		88:21	26:24
235:13,16		170:7,11	part	31:15	parties
packet	204:7	179:7		42:25 45:6	164:15
pages	107:21	180:12,22		46:6,8,25	221:8
124:8		184:4		59:19 62:7	parts 160:4
127:14		193:9		66:11	190:3
129:4,6		194:18		75:19 87:8	party 57:22
140:3		198:22		92:11	164:16
166:11		parameters		93:14	
167:8		225:25		107:12	pass 24:20,
184:8		226:6,7		111:22	21 68:9
188:9		paraphernalia		114:7	passage
214:19		181:15,19		122:21	192:2,4
215:2		parents		138:1	passed 19:11
216:5,16,		157:7		140:24	226:20
21 223:16		158:3		141:4,8	231:18
paper	37:12,	163:5		143:1,2	
16 190:11		park 76:6		159:23	passenger's
204:9		89:12		162:11	153:21
				163:17	past 67:15
				164:2	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: path..person-on-person

120:22	people	16:12	204:23	90:7 141:6
path 157:24	39:18 52:2	205:6	159:2	
	59:12	212:1	173:3,4,7	
patients	60:21	percent	192:8,11	
113:12	61:6,8,12	20:14,16,	229:8,12	
patrol 82:2,	62:13,17	17,18	periods	
10,13,17,	65:7,8,13,	120:25	39:16	
24	16,22 66:5	184:16,18	183:7	
patrols	73:4,7	190:15,16,	permitted	
80:24	84:14	17,18	7:12	
	95:21,24	191:5,6	person 16:4	
pattern	96:13	209:3	59:24 61:1	
179:14	110:4	220:6,7	63:10	
180:1,5	126:8	224:24	69:23	
201:1	131:16	225:16,18,	97:13	
patterns	135:3	19,21,22	98:10	
199:11,12	136:5,10	percentage	99:22	
200:4	137:1	225:14	102:13,19,	
pay 85:7	142:8,16,	perfect	22 103:7,	
	17 143:4,	77:17	11,19	
paying	11 144:4	perform	116:16	
133:21	151:25	210:3	139:24	
payments	152:2,4	performed	145:2	
85:8	155:4	52:16	148:25	
PDF 235:13,	157:19	performing	154:6	
16	159:12	213:4	158:5,20	
peephole	161:8,18	period	159:9	
158:23	177:6,8	39:11,12	183:1	
peer-reviewed	182:3,24	54:25	190:13	
115:11	183:2	79:22,23	194:10,14	
116:5	188:19,21,	80:1,4,8,	205:21	
123:23	24 189:5,	22 82:12	232:22	
penal 15:21	21 190:17	83:4,8,17,	person-on-	
	191:5	23 85:6,	person	
pending 8:21	193:25	12,17,20	152:15	
119:2	195:15			
121:9	197:8			
	200:11			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: personal..plaintiffs'**

personal	phenomenal	pimps	179:8	places	88:5 ,
88:23	134:24	pinpoint		19	89:3 ,12
111:10	phone 81:8 ,	139:17		160:23 ,25	
personally	11 160:12	pit	169:8	161:13 ,14 ,	
13:20 30:5	194:9	pitch	23:20	21	163:2
60:4 62:2	phones 83:1	Piza	197:3	plaintiff	6:4 27:3 ,7
120:16 ,20 ,	110:3	place	8:7		29:1 32:4 ,
24 162:10	160:10	25:24	46:7		6 ,9 37:22
personnel	204:23 ,24	47:8	52:3		38:1 ,5
68:12	phonetic	65:18	73:5		41:20
216:17	190:11	77:24			69:24
persons	photos 75:1 ,	87:24 ,25			96:23
99:13	2 ,3 ,6 ,13	90:9 ,12			97:25
101:15	phrase	106:3			104:12
104:22 ,23	180:17	128:21			126:16
176:13 ,18	201:19	132:21			139:22
203:22	213:15	150:18			143:20 ,24
232:25	physical	151:4			220:3 ,7
perspective	24:9 25:7	152:19 ,24			221:5 ,18
96:16	108:6	154:12 ,13 ,			235:8
203:11	128:21	14 ,15 ,19 ,		Plaintiff's	
pertain	130:8 ,22	20 ,22 ,23			126:19
10:13	140:9 ,17	155:2 ,3 ,4 ,		plaintiffs	
108:15	163:10	10 ,12 ,14 ,			4:15 5:17
pertaining	194:18	15 156:1 ,			6:13 ,14
229:12	204:21	14 157:20			33:15 ,20
232:11	205:1	158:11 ,12			34:12 35:6
phase 86:11 ,	212:2 ,4	159:3			36:16 ,25
14 ,18 ,20	physically	160:22			39:8 57:21
87:7 ,14 ,17	73:12	163:3			140:3 ,12
88:4 ,14	195:20 ,25	185:24		plaintiffs'	
89:1 90:5 ,	209:7	186:18			36:19 40:6
23 110:22	picture	190:22			43:9 55:25
phases 86:20	75:11	199:9			70:17
87:12	148:15	202:8			86:7 ,8 ,9
		228:10			96:21

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: plan..populations**

97:2,3	plan	33:14 ,	231:12 , 18	16 , 25
104:11,13		19	234:23	144:7 , 15
107:17		planning	pointing	147:13
113:17		9:2 , 5 35:3	91:21	154:3
126:15 , 25		140:11	points 7:25	156:25
127:3 , 9		146:20	8:17 71:12	161:10
128:18		play 21:23	145:21	164:7 , 11
129:5 , 14		65:8	178:24	168:13 , 18 ,
138:8 , 9		153:10	212:20	20 , 21 , 24 ,
139:9 , 21		plea 69:19	Polaris	25 169:6 ,
140:23		plenty 126:7	118:24	11 170:17 ,
144:18		plot 54:3	119:3 , 12	21 , 25
147:10 , 12		point 8:19	121:14	171:9 , 11 ,
149:16		16:6 23:10	126:21	18 172:1 ,
17 160:13 ,		28:13	130:3 , 10	10 , 13 , 16 ,
19 162:13 ,		44:19	131:15	19 183:15
14 165:1 , 3		48:16	132:4 , 25	186:23
169:24		70:18 71:7	police 39:9	196:10
170:3 , 10		78:25	44:12 , 17	197:20 , 22
173:6		80:18	49:17 , 19	198:13 , 20
174:4 , 8 ,		82:10 96:5	51:24 52:3	200:13
11 , 13		101:25	61:2 , 3	204:3
177:10 , 12 ,		110:20	62:18 , 25	205:2 , 5 , 6 ,
16 178:15		116:5	68:20	18
179:6 , 24 ,		119:22	81:1 , 3 , 5 ,	policies
25 180:22		130:19	21 , 22	17:13
184:2 , 8		134:3	82:3 , 7 , 14 ,	203:21
193:2 , 3		147:11	24 83:11	policy
194:15		149:15	94:5	94:15 , 20
196:1		150:7	101:15	196:5
201:5		159:1	119:15 , 17 ,	politics
202:15		185:2	25 122:11	164:21
205:24		195:6	128:21	pools 90:7
233:25		202:3	140:25	population
235:7		212:1	141:1 , 19	107:12
		220:6	142:7 , 9	populations
			143:3 , 4 , 9 ,	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: portal..prevent

107:11	117:22	preceding	presence
portal	124:12	177:1	118:18
68:10,15,	137:6	predicated	present 6:18
16 84:25	power 21:3,	162:5	presentation
portals 68:5	11	preeminent	114:3,4
pose 131:5	practical	151:10	presentations
position	43:11 50:8	201:15	26:24
9:9,12	114:18	prefer 168:2	124:1
209:25	125:2	preference	217:14
positioned	134:7	20:16,17	presented
73:12	practice	preferential	131:15
positive	7:13,18	25:16	preservation
128:23	11:17	preliminary	7:14
possessed	13:24	6:3	preserved
145:24	20:15 26:9	premise	6:23
possibly	50:22	219:18	pretest/post-
74:8	58:24 82:7	premises	test 117:2
164:18	85:24,25	175:14	pretrial
post 81:25	86:4 95:17	176:17	220:23
99:19	96:16	210:10,16	pretty 73:19
101:18,22	116:19	213:13,16	115:22
Post-covid	138:22,24	preparation	186:17
161:19	173:14,16	196:6	194:14
posted 99:12	204:12	prepare	prevalence
100:3	233:4,14	42:16	105:13
posting	practices	47:13	106:2
100:18	48:25 59:2	48:19	136:6
203:22	81:20	prepared	214:13
232:15	114:25	33:12	prevalent
	217:13	38:13 78:6	177:22
posture	pre-9/11	206:14	prevent
155:14	16:21	207:5	90:24
potential	pre-covid	219:13	91:18 92:4
15:2	225:16	222:9	93:19

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: prevented..professional**

95:9,12	196:15	privilege	procedures
162:16	209:1,9	6:22	17:13
163:16	211:5,18,	proactive	proceeding
164:4,22, 25 198:1	21	196:13,20	210:5
prevented	primary 33:4	proactively	211:13
	36:3	197:24	218:3
162:20,23	121:22	probation	proceedings
164:10	print 68:11	158:9	4:1 235:25
229:18,21	printed 37:8	problem	process
preventing	printing	40:20 73:2	19:14
163:24	85:1	82:5 91:23	45:24
164:12	prior 5:21	109:19,22	47:13
prevention	8:16	119:14	86:17,18
18:13,18	115:17,19	136:2,4,5,	110:12,14
22:15	215:1,5	11,16	112:21
49:16	218:11	137:8	155:7
81:23	219:14	148:13	186:7
85:21	222:8	152:9	187:7
148:13	231:18	155:18	193:7,13,
201:21	prison	156:23	18 194:9,
204:8	164:16	157:10,13	14 200:9
218:13	privacy	161:16	214:7
previous	93:25	163:1	223:4,6
86:15	178:8,14	169:3	233:3
previously	private 14:1	170:19,23	produced
16:23 35:3	93:23	174:17,20	57:20
106:6	100:4	183:12	64:13 97:5
218:8	111:9	186:25	product
primarily	113:11	190:20	208:8,15
51:11	135:4	191:7	209:12,15
56:25 59:7	154:24	228:25	products
123:5	178:1,2,11	problems	208:19
133:15	198:3	109:21	professional
151:22	208:6	185:18	18:25 24:4
168:8	209:3,9	procedure	25:18
189:21		7:13 47:13	210:1

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: professionals..protective

223:1	201:18, 22	83:5, 9, 19,	prosecuted
professionals	prompted	21 90:2	148:21
23:19	185:5	91:6	prostitute
128:10	promulgate	103:13	15:25
profiling	132:6	135:23	137:15
13:14	promulgated	152:13	prostitutes
program	132:3	153:14	15:5, 18
46:10, 15	180:9	154:17	44:22
77:24	proof	155:7	179:9
78:11	84:17	156:17	
79:11	proper	168:20	prostituting
programs	133:2	170:18, 22	137:2
55:7 56:1	properly	172:11	prostitution
216:18	7:10	175:8, 9, 10	48:3 50:20
prohibited	132:12	176:13, 23	51:19
194:23, 24	properties	183:3	59:15
195:2, 4	50:16 51:1	185:13, 18	148:10
project	52:10	186:18	175:9, 16,
15:9, 14	53:10 54:2	187:19	20 176:20
16:21 20:1	55:3 57:7	188:23	179:15
44:2, 5	161:12, 17	189:6	185:22
76:3	197:17	195:24	190:18
126:21	199:12	202:5	204:2
127:6	203:5	205:4	205:8
193:22	property	214:23	
197:12	20:9 39:14	219:15	protect 46:1
projects	44:19 47:5	232:23	90:24
19:23 44:8	51:12	233:1	121:23
53:25 54:1	52:12 54:1	proposal	159:12
56:10, 12,	57:5 71:5,	187:21	215:23
17, 19, 23,	6, 13 72:8,	proposed	protecting
24 170:20	18 73:14,	134:18	46:3, 5, 13
promising	15, 18, 23,	proposing	215:24
115:6	25 74:1, 3,	123:4	Protection
138:3	15 79:24	proposition	18:24
	80:2, 5, 15	223:10	protective
	82:18		16:22

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: provide..qualify

153:10	235:2	114:12	112:12
provide 9:12	provider	116:10	118:25
32:3,11	11:12	132:9	127:3
33:14,19	14:12	195:15	185:20
34:1,10	providers	pulled	195:10,12
35:19	112:17	44:11,16	197:17
36:8,15,	providing	46:24 47:4	200:13
18,24	156:15	95:1	202:7
53:19	214:18	pulling	225:25
64:23	psychiatrist	116:12	226:5,6
106:6,18	12:21	putting	
110:2,3	psychologist	pumping	187:4
134:15	12:23	153:20	195:8
135:14	public 76:4	purported	
182:20	89:2,11	126:7	Q
189:12	90:9,11	224:12	
196:10	160:11	purpose 72:5	QR 82:19
205:15,16	publications	108:3,8	qualifications
209:20	22:22	161:2,23	21:23
210:22	23:11	210:8	186:20
221:21,25	55:13	purposes	223:22
224:3,4,5	217:14	6:10 7:11	224:7
229:6	224:16	9:5 94:10	qualified
230:3	published	160:22	19:25 21:9
provided	21:7 22:13	235:6	25:21
11:6,10	42:21	purse 152:14	120:2,9,11
17:23	55:6,16,19	pursuant	183:19
38:18	56:6	7:10	212:13
42:22 83:3	123:23	purview	218:8,16
99:2	190:12	159:24	220:16
158:21,22	201:23	push 195:17	qualifies
190:9	publishing	pushed	19:20
197:18	23:6	206:20	21:13,16
223:15	pull 106:5	put 12:11	22:3
224:1,7		62:6 68:12	qualify
226:21			25:10,11,
233:23			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: quality..realtime

12, 20	177:2	179:21	rambling
207:25	178:24	182:13	138:4
quality 17:2	179:9	186:1	randomized
21:3, 4	182:5	189:11	115:11, 19,
	184:9	225:10	25 117:1
question	185:4, 5	226:23	
6:22 26:17	189:9	231:16	range 53:20,
34:8 42:4	192:25	232:4, 6	23
47:16	195:3	234:8, 10,	rape
51:22	196:22	20, 23	174:23, 25
52:14	197:6, 10		
60:11	200:17, 22,	quibble	rapes 175:9
63:8, 18	23 211:8	23:22	rare 115:22
65:17	222:8	quick 40:18	134:13
78:19 81:5	232:9	42:4	rarely 94:4
82:11 88:2		103:22	
103:6	questioned	175:3	ratio 138:15
106:7, 15	232:10	226:12	raw 44:16
107:5	questioning	quickly 92:7	read 108:22
110:6, 20	28:17	quiet 200:15	114:6
112:24	112:16	quote 46:17	141:24
114:2	232:2, 12	141:3	166:12
115:13		144:14	171:20
questions	8:21 28:13	167:3	230:22
118:14	41:24 42:1	180:24	235:12
121:24	58:2 62:3	201:25	real 133:23
124:12, 21	79:18	211:11	191:7
132:12	102:3		208:2
134:24	108:6	quote/unquote	
135:18	113:9	115:12	reality
138:13, 18	124:10		136:21, 23
141:5	126:23	quoting	
144:14	127:10, 13,	201:14	realize
146:6, 23	20, 25		169:19
147:2	128:9, 15	R	
157:9, 15	129:4, 6, 7		realm 148:2
159:19, 20	130:6, 23	raise 4:25	203:19
172:25	131:5	42:1	realtime
174:17		183:14	67:7

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: reason..recommends**

186:8,12	24:16	98:13	recollection
196:7,15	44:7,18	206:5	44:2 60:12
197:1	47:25	217:3,5	64:1,10,19
reason 9:8	48:5,12,22	223:20	85:16
111:2	49:2,11,	227:21	93:15
126:13	17,18	233:20	142:24
134:11	50:1,3	receives	143:12,13
164:9	60:18,19	101:2	recommend
183:15	64:3,5	104:17	58:11 59:4
232:22	69:5,7	106:24	101:5,20
233:6,12	70:2 72:2	receiving	130:3
	73:16,17	6:18 99:5	132:23
reasonable	77:8	recent 54:24	133:5,8
6:18 41:8	78:12,14,	124:15	138:23
101:18	23 85:11	133:18	187:16
109:24	87:5	recently	190:22
134:6	116:22,24	50:22	208:14,18
201:8	117:5	recertificatio	209:13
202:7	139:17	n 19:11	232:16,21
228:10	141:7	26:22	recommendation
reasons	183:22	recess 70:7	192:21
126:4,8	189:22	104:3	recommendation
223:11,15	190:3	173:24	s 49:15
228:13,18	recalling	227:15	99:3
rebut 222:6	189:2	recite	172:11
227:5	receipt	146:24	187:25
rebuttal	100:13	recognition	195:1
222:9	102:6	95:20 96:3	recommended
226:13,14,	receive	137:4	187:11
19,21,23	42:16	198:7,8	196:19
227:21	82:13	recognize	recommending
231:18	received	35:5 210:2	130:4
rebutting	40:9 43:4	recognized	191:8
221:22	57:10,13,	208:11	recommends
230:4	20 58:5	23:18	208:8
recall 12:13	59:20	207:15	
	69:17		

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: record..reliable

record	5:13	REDIRECT	referring	related	18:3
	6:2,9,15	233:18	6:12 7:24	66:23	
	7:1 8:25	reduce 183:2	8:1 37:11	189:11	
	68:15	194:19	40:22,24	209:24	
	70:4,6,9		41:19		relates
	93:4	reduced	56:20		47:17
	103:24	198:24	90:18		89:1,14
	104:2,5	reduction	113:3		90:5
	146:13,25	96:8	116:14,15,		111:24
	149:6	refer 123:7	20 134:1		relating
	173:21,23	137:22	148:25		69:24
	174:1	140:6	161:18		
	177:8		166:9		202:17,18
	226:9,12	reference	171:15		relationship
	227:2,3,8,	102:15	207:1		107:6,8,10
	10,12,14,	referenced	refined 47:8		185:6
	17,21	62:14			relative
	235:19	75:16	refining 188:2		76:11
recorded		149:22			194:1
	62:5 79:3	references	refuse 160:2		201:6
records		6:14 42:23	regard 83:3		relevance
	67:19,23,	55:12	231:14		65:19
	25 68:3	102:17			relevant
	85:8	136:17	registration 76:6		41:25
	130:9,21	150:6			102:7
recruitment		190:10	registry 49:21		103:1
	86:21,25	206:23			104:18
	87:1	224:5	194:3,10		167:17
red	118:23	referencing 7:17	205:13,15		169:13
	119:21				229:12
	124:3,5,23	referrals 84:5	regular 85:21		reliable
	125:21		regularly 94:9		9:12
	131:9,12,	referred 84:15			105:23
	13,18	123:8	rehabilitation 156:13		106:3
	132:3,6,9,	203:18			124:6,24
	14 134:17		relate 10:7		125:10

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: rely..represent

rely	133:4,	rented	159:8	118:22, 23	reports
7	134:19		178:2	129:5	32:19, 22
135:15			193:19	140:8	33:1, 12,
168:12		renter		141:24	18, 23
remember			158:18	143:6, 7	34:5, 6
24:15		renting	48:8	145:22	37:8 38:9,
33:22			93:24	146:1, 13,	12, 15, 23,
44:14			125:3	14 147:14	25 40:1, 8
72:22			133:22	148:5, 7	41:1, 6, 7,
74:13 77:6			159:9	154:15	17, 23
79:8 95:6		repeat	176:3	159:10	42:8, 11,
104:13				166:23	16, 21 43:5
142:12, 16		repeating		167:8, 9	44:18
145:6			77:17	176:1, 16	57:17 58:6
167:1		rephrase		180:14	59:20
172:7			36:22	201:10, 21	62:14
219:13		report	34:13	203:12	69:10
232:12, 18			37:20, 24	207:5	75:15 78:5
remove	153:1		38:3, 19, 20	214:10	79:7
155:20, 21			39:19 40:6	222:10, 13	80:16, 23
removed				226:13, 15,	81:6 82:8
31:22 60:2		41:20 42:5		17, 21, 25	85:1 124:8
renew	188:25		43:3, 9	227:21	127:15
189:1			46:16	228:3, 5,	128:3
204:20			48:9, 19, 21	13, 17	165:9, 14
			49:1 62:6,	230:20	168:13, 16,
			7, 9, 12		18, 20
rent	69:2	reported			169:11
99:22			68:12		173:2, 12
100:1			74:21, 24		184:9, 13
134:12			75:7 79:12		188:9
155:5		reporter	84:23 85:2		206:9, 15
205:22			90:21		213:23
			98:11		214:9
rentals	49:9		103:11, 12		217:7, 9
125:3, 15,		reporting	105:6		220:11
23 135:1, 8			107:17, 22		represent
192:20			112:2, 7		5:16 38:8
204:17			113:1		

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: representing..responses**

39:25	83:2 95:1	224:17	87:16
70:17 86:7	180:14	225:22	88:13
92:19 97:5	203:12	researched	100:9
127:8	214:25	21:6 22:14	118:16,17
150:16	requirement	55:5,16,19	185:21
170:9	20:8 21:15	56:5	198:7
174:10	23:6	researcher	202:23
180:21	requirements	120:5,20	211:20
217:2	20:8 95:6	researchers	228:8
233:23			231:10
representing	requires	120:2,9	respected
10:1	26:21,22	researching	207:15
reputation	57:5 58:22	53:14	respective
161:14,18, 22	59:3 112:9	reserving	173:2
	213:2	226:22	respond
request	requiring	residence	121:17
94:3,4,6, 12,16	49:20	88:23	197:23
119:2	research	111:10	responding
121:10,14, 17	22:22 23:5	residential	55:7 56:1
168:13,	31:15	51:3,6	81:24
19 169:14,	42:20	54:6 87:25	164:8
15 196:11	49:13	88:21	171:12
	113:19	residents	172:2
requested	114:1,20,	59:1	response
44:11,17	24 115:10,	Resource	99:5
127:1	17 117:6,	127:5	100:12
151:15	15 118:1,	resources	106:7
167:24	10,20	18:4	138:6
require	119:7,11	respect	171:18
19:23,24	120:6,20,	13:11,14	209:2,9
20:10,12,	21,25	39:10 48:4	217:17
18 80:23	121:1	49:14	224:3
82:13	126:10	50:14,24	responses
196:11	127:12	55:20	64:3,9
205:11,12	189:18	59:14	
required	203:4		

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: responsibilities..robbery**

responsibiliti	review	34:19	reviews	50:17,19
es	17:22	41:5 51:10	85:13	52:9,10,
	59:8	57:6 58:5	115:16,20,	15,18
responsible		59:21	21 116:25	54:18
	52:2	63:25	revised	64:24
	154:13	68:25	206:7	65:24
	155:1	69:8,19,23	Richens 4:20	66:11,12
	158:17,19,	75:12	6:24 7:17,	67:14
	23	79:16	21 21:18	83:19,21
		83:24		99:3 102:8
rest	91:7	92:11 93:4	29:12	103:2
	201:10	115:16	90:10	104:18
	228:4	124:16	94:24 99:7	134:16,23
restroom		130:9,22	101:9	135:13
	102:1	133:18	102:10	165:6,17
result	192:2	145:18	103:4,15	166:1
	199:21	146:17	104:20	167:17
	209:6	196:12	144:13	185:12,15,
		216:9,11,	153:18	24 186:7,
resulted		17 222:18	167:19	16 187:7,
	152:5		169:21	12 188:7
results		reviewed	182:11	191:15
	119:5	34:24 39:3	183:9	192:13
	187:8	47:7	199:7	200:9
	219:9	57:13,20	218:2	201:6
		63:23	232:8	203:19
retail	53:9	81:11	233:15	224:17
retain	85:7	92:11 95:5	235:17	risks 45:25
		142:6		
retained		143:14	rigorous	52:20
	44:3 57:4	145:11,12	19:13	54:19
	201:20	162:2	Ring 187:6	66:22
	221:17	171:8	risk 20:4,	107:7
		231:2	6,9,12,22	159:16
retired			21:4,5,8	191:17
	151:14,16	reviewing		
revenue		114:22	22:16 44:8	road 125:7
	224:21	121:1	46:12	robbery
	225:3,10	196:6,7	49:4,6	90:20

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: Rocco..section

144:12	182:8,10,	107:6	school 9:18
219:13	19 188:20,	runaways	12:16
Rocco 4:7	24 194:1	104:24	103:14
	195:11,18	105:7	151:21
Rockdale	197:9	107:11	154:8
97:10	198:11,13		199:21,22
role 16:19	205:7,13,	running	
82:6	16,20	158:15	schools
122:10	233:6,7,10	Russell 4:21	157:8
208:24	rooms 49:21	Rutgers	scope 39:15
210:23	76:16,17	151:20	92:21
rollup	94:9 110:4		230:17
195:10,21	155:5	s	screen 96:21
rooftop 90:7	193:20,22		102:12,20
	204:19,23	safe 113:6	222:19
rooftops	rose 225:17	128:20	screening
90:7,8		130:10	124:11,17
room 39:21	roughly	165:15	130:5
41:4 91:8,	225:19	safety	133:9,10,
11 93:21,	routine	217:18	17,19
23,25	71:18 94:7	229:11,13	search
94:15	151:9,12,	salon 136:15	192:17
95:17,22,	23 152:22	sample	searches
24 96:11,	224:5	113:10	106:11
12 111:12	Rubmaps	sat 96:12	seat 153:21
116:2	31:14	189:22	Seattle
119:21	rule 116:11	satisfied	184:17,20
133:24	rules 7:12	68:24	secondary
137:1,8,9,	8:14	save 68:11,	187:2
12,16	188:10,11,	15	section 39:6
155:8	15,22		40:9,11,
158:24	189:7	saving 85:2	14,16,24
159:7,8,9	203:21	scan 82:19	41:2 57:10
178:8,11,	run 99:24	schedule	108:3,8
14 180:18,	runaway	198:21,24	118:23
25 181:6,	105:3		
7,15			

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: sections..separately**

129:9	6,16,18,	212:2,4,	selling
150:6	19,20,25	11,12,22	25:15
161:2,23	82:1 99:2	213:2,6,9,	137:2
177:14,17,	114:5,18,	13,19	196:24
20 178:16	21 118:25	215:22	send 95:23
179:7	120:5,23	216:1,17,	187:20
193:4	121:6	18 217:12,	197:12
sections	122:4,7,13	18 218:13	198:11
40:7 41:6, 13,17	132:4	221:8,10,	sense 73:3
sector 123:6	155:14	11 224:17	125:2,4,
198:3	159:15	228:12	10,13,16,
security	164:19	229:11,12,	22 134:11
10:14	172:11	16	164:2
11:20	176:17	security-	198:14,15
16:18,23	185:12,15,	related	sensors
17:4,9,11	23 186:4,	65:23	82:18
18:6,17	6,10,19,24	114:24	
19:1,4,5,	187:7,12,	seek 58:7	sentence
19 21:14,	188:2,6	sees 26:12	56:9
17 22:4,	194:18	SEG 17:2	129:16
14,16,24	196:6,19	self-guardians	139:22
23:15,19	197:16	153:12,23	141:18
24:2,5,6,	200:9,13		170:10
9,10 25:4,	201:7		177:19
5,7,13,18,	202:1,7,	self-	178:15
19,23 44:8	17,18,22	guardianship	184:3,7
45:23	203:11	153:18,22	201:4
46:7,10,15	204:22		
47:7 50:17	205:1	159:11,17	
57:2 58:14	207:17,21	self-report	sentences
64:22 66:6	208:3,5,6,	109:4	140:2
69:9,10	7,10,11,	110:5	179:13
75:4 77:24	21,25	self-reporting	separate
79:11,19	209:5	108:22	5:17 108:7
80:2,5,23,	210:1,11,	self-study	130:23
24 81:1,4,	21 211:4,	19:6	148:10
	23,24		164:15
			separately
			39:5

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: separation..Shareef**

separation	serving	88:7,10,	149:4
113:6	154:2	11,13	159:16,23
September	212:7	89:2,7,14,	162:19
206:8	set 32:22,	20 90:5,	172:20
serve 21:14,	25 36:10	16,23	174:21
16 22:4	40:1 68:8	91:1,2,6,	177:21,24
115:9	169:10	16,22,25	178:12
210:4,16	195:23	93:17 95:8	189:14
211:11	198:9	99:4	190:14
		102:8,13,	191:3,17,
served 7:10	setback	21 103:3,	24 192:13
	195:14	7,19	200:18
serves	setting	104:18,23	204:1
154:17	107:23	105:3,9,	214:13
service	108:1,16	14,18	217:20
14:12	109:2,6	107:7,14,	218:17,19
16:22	124:25	22 108:15,	220:17,19,
44:15	134:2	23 109:4	20,25
165:2,7,9,	sex 14:13,	110:7,12,	221:18
14,17,19	15,18	13,14,22	228:24
166:1,3,12	15:2,13,	111:5,8	sexual 87:8
167:11,16,	18,25	112:2,25	200:24
21,25	16:9,13	116:4	
168:3,5,	18:11,14,	119:19	Shaq 29:6
10,17,22,	16 31:6,11	122:2,8,14	144:6
23 169:4,8	33:20,24	123:2,12	158:6
171:19	34:2,12	124:3,5,23	share 96:22
172:2	43:11,17,	126:12,24	106:5
196:25	23 49:4,6	127:19	shared 99:10
208:9	50:10,14,	129:21	100:18
210:22	20 51:19	131:9,10,	231:22
services	52:11,20	23 132:1,	Shareef
11:6,9,12	54:19	6,16	29:25 30:3
16:24	55:6,7,16,	134:16,23	32:12
25:15 94:8	20 56:2	135:13	34:25
134:15	66:12,23	136:4,19	35:6,13
208:19	71:8 85:18	137:2	59:25
	87:11,23	144:9	

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: Shareef's..similar**

60:8,17	shoplifting	showing	112:1,6,
61:25	199:20	69:16	11,15,25
62:2,21,24	shopping	117:16	118:18
63:5 70:22	53:8	119:8,12	130:13
77:23	199:15,23,	191:2	signals
79:2,6	24,25	198:2	111:19
80:12 81:8		shown 64:2	
83:24	short 58:13	153:7	signature
99:12	74:11,18	160:15	97:9
100:17	109:16		
147:8	125:9	shows 150:18	significance
171:16	173:17	184:25	207:24
181:2	176:22	193:14	significantly
185:4,17	183:7	224:9	109:17
186:15	229:4	shut 225:17	signify
200:10	230:10		19:16
202:5	shortly	side 89:11	signs 121:7
shareef's	32:19	153:21	123:12
80:17,19	191:23	154:5,12	134:18
sharing	show 23:6	157:5	136:14
231:3	96:20	189:25	204:21
shay 29:6	126:14,24	sidewalk	228:23
	142:11,25	195:7	similar 40:2
sheets 69:13	145:16	sidewalks	41:18 76:7
Sheriff's	171:6	90:1	146:6
97:10	179:2	sign 111:5	160:23,25
	189:19	112:8,11	162:9
Sherman	190:6	113:3,4,5,	174:11
201:14,23	197:4	13,14	178:23
shift 60:24	200:7	118:19	179:9
61:4	201:2	235:12	184:7,9
shooters	203:4		185:5
121:2	233:22	sign-in/sign-out 69:13	203:6
shooting	showed 143:1	signage	similarly
178:7	197:24	45:16	7:3
219:13	shower 125:6	75:11	similar s
		111:24	215:5

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: simply..site

simply	68:9	29:2, 4, 7, 102:21 104:24 149:25 164:24 189:21 223:3 233:12	86:13 9, 13, 18, 21 30:1, 7, 11, 13, 21 31:9 32:5, 8, 10, 13, 19, 23 35:15, 18 36:17	177:13 178:22 179:12, 19 180:3, 16, 20 184:6, 12 185:14 188:14 191:18
single	53:13 54:3 199:8 200:2	37:10, 15, 19 38:11, 14, 17 40:10, 12,	105:2 106:10 107:19, 20, 21, 24	192:22 193:5, 8, 10 194:21 196:4
singular	86:17	15, 19 41:4, 9, 11	108:3, 13, 17 109:1	199:1, 2 206:2
sir	5:5, 14, 15, 16, 22 8:3, 8, 9, 12, 15, 23 9:11, 14, 15, 19, 22, 24 10:9, 12, 19, 21, 23, 25 11:17, 25 12:3, 6, 9, 13, 15, 17, 20, 22, 24 13:2, 4, 18 14:6, 8, 11, 14, 17 15:16 16:19 18:21 23:16 27:4, 6, 9, 11, 13, 15, 18, 24 28:2, 22, 25	42:5, 17 43:12, 13, 16 46:21 47:15 50:5 52:13 54:14, 20 55:10 56:13, 16 57:11, 18 58:9, 13 62:1, 4, 10 69:12, 15, 18 70:17, 23, 24 72:1, 12, 20 73:11 74:25 75:8 77:21 78:1, 7 79:4, 14, 25 80:3, 7, 21 81:14 83:7, 16 84:21 85:9	111:21, 24, 25 113:21, 23, 24 114:8 115:4 122:5, 10 127:7 128:4, 7 129:13, 18 139:14 140:1, 21 141:2, 21 143:15, 23 147:16 148:18 149:17, 21 150:10, 21 151:7 159:13 160:17 165:12 171:2, 5 172:21, 23 174:9	207:3, 6, 10, 14, 19, 23 210:7, 12, 14 213:24 214:2 216:4, 14, 19, 22 218:10, 22, 23 219:24 224:23 225:5 230:25 231:25 232:5, 13 234:4 235:4 sit 42:10 180:4 198:15 231:4 233:5 site 74:23

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: sites..specifically

95:15	164:10	198:1	specialist
147:8	188:23	sort 47:12	154:10
153:13	six-star	151:1,2	specialization
216:17	175:5	157:17,23	13:7 22:8
225:24,25	slack 100:21	164:1	specific
sites 95:18	slave 87:21	178:23	15:1 39:7,
sits 152:6	slightly 8:2	sound 70:15	17 41:23
sitting 33:9	138:13	119:1	43:19,21,
50:3	small 10:15	sounds 35:22	24 44:13,
73:16,17	17:9,10	92:15	18 46:19
116:2,16,	134:12	133:24	47:9,19,25
21 119:20	154:16	226:16	48:11
133:24	197:2	source	52:18
143:3	Smith 4:18,	127:13	64:1,10,18
153:20	21	128:1	75:23
158:16	smooth	space 93:23	76:13
225:19	155:2,3,7	111:9	85:15
situated	social 17:9	113:6	93:15
129:20,22	160:1,4	135:4	95:16
130:25	163:12	152:24	107:5
131:23	society 19:4	154:24	131:17
132:1,2	114:5	158:18,19	133:1
situation	163:6	178:1,3	139:18
15:21 20:2	176:14	195:5	161:13
39:20	sole 10:5	space/ conditions	165:5
59:14	solemnly 5:2	128:22	168:21
66:22	solicit 89:8	speak 23:3	181:11
100:17	solutions	28:3 54:3	183:3
154:19	109:21	118:24	197:15
156:16	solve	148:16	199:9,12
194:5	109:19,20,	speaking	208:19
195:5	22 147:20	89:23	230:12,17
197:7	148:13	144:15	231:14
situations		154:22	233:7
156:7			specifically
			14:22 39:9
			48:4 50:15

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: specifics..started**

52:17	56:4	spoke	34:25	135:15,16	36:2,4
60:24	64:4		60:5,13	138:14,21	56:6
70:2	78:24		204:10	139:4	58:15,22,
88:12	89:2	spoken	5:21,	172:20	23 59:2
100:9			24 27:3,7,	179:16	120:14
101:3			12 28:1	180:12,23	202:2,10,
103:10,12			29:1,5,20,	183:18	11,16,18
108:18			24 30:2	189:14	203:2,5
124:22,24			123:16	200:11	205:14,17
125:5				203:12	229:5
129:10		sports		204:9,10,	233:4
135:1,22			164:21	24 205:4	standardized
148:5		spot	162:4	228:23	210:9
160:22			197:21	staffing	standards
172:6		spots	194:20	63:15,21	13:10
183:24			195:24	120:23	207:17,21
189:8			197:15	138:10,19	229:11
192:10		staff	44:24	198:25	standing
200:6,24,			47:3,10	staffing-	28:16
25 205:9			58:12	related	164:11
229:8			59:6,21,	138:12	
specifics			22,23	stairs	stands 18:24
228:15			60:1,4,13,	76:25	204:19
speculative			21 61:8,17	stairwells	209:11
229:20,24			62:15	90:1	start 18:6
speed	23:7		63:1,5,22	stakeholder	23:11
spend	120:25		64:13,17	51:25 52:1	70:25
135:25			65:11,12	stakeholders	72:16
225:11,14			66:4,7,14,	51:13,24	111:17
226:1			15 67:10	52:4	112:20
231:13			69:14,17		148:13
spending			94:1,2,8,	stand 96:10	191:25
44:19			12 99:10,	standard	192:1
231:6			13,16	18:25	200:15
spent	71:4		100:8	19:19	214:24
			101:6,19	23:18	215:14
			110:4	35:25	started

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: starting..studies

16:21	24:8	128:21	24	store	153:25	
44:9	50:14	153:19	step	45:25	stores	53:9
114:16		stations		46:12	story	78:22
161:18		71:17		130:12		195:22
191:23				176:19		
212:1,6		statistics			stranger	
		44:10	stepping		162:16	
starting		105:22		168:12,18		201:24
22:6	86:24	147:22	steps	112:21	Strategic	
114:11		162:2		192:13		45:23
214:12		200:4	sticker		street	45:12
starts	43:10	stats	106:4	112:13		48:15 76:5
86:11,16,		147:7		sticking		89:8,11
18	117:11	161:11		49:10		144:5
129:16		stay	30:12,	stipulate		195:6,14
170:1			19,25		stress	43:17
184:4		77:9,10,15		7:1 234:24		
214:8		95:3	stipulating		strip	88:20
state		138:20		234:18	stripe	37:18
122:20,23		139:6	STIS	133:12	strongest	
123:2		189:1	stolen	137:2		24:24,25
164:16		204:4,20	stone	71:16		25:6
stated	7:3	stayed		168:12,18	structural	
33:17		30:10,22,	stood	9:25		45:13 92:2
80:10		23 77:7,8	staying	10:5,17	structure	
91:22	92:8			76:4		76:2
223:2		77:14	stenographer			
statement			4:24 7:5	stopped	struggling	
201:10		97:16		54:25		191:11
209:25		steel	174:25	stopping	stuck	169:7
states	9:21			101:25		
17:17,20		steno		stops	studies	
111:3		115:3,7	125:8,	125:8,	42:22,24	
stating		127:1		18	115:11,19	
191:3		151:15			117:2,7,8	
station		234:3				
		235:14,20,				

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: study..suspicious

118:16	173:15	70:13	119:3
189:20	229:17	75:17	123:20
190:6	subjected	77:20,25	124:10
197:2,4,11	121:15	99:5 108:1	126:11
198:3		129:20	
study 19:9	submit 48:19	138:15	supporting
23:8	80:23	143:14	
123:22	234:20	144:1,20,	supports
185:7	submitted	22 157:21	118:20
190:12	48:21	171:1	suppose 67:8
191:2	subscription	172:3	supposed
197:11	196:25	178:20	176:21
201:23	subset 191:6	179:16	
stuff 17:15	sued 156:5,	188:1	surveillance
18:7 50:13	6	225:24	49:21,22
92:16			115:23
119:14,23	suffered	179:4	196:3,20
134:7	36:16	206:6	survey 117:6
155:16	sufficient	summarized	216:7
162:25	60:13	175:23	survivor
169:13			14:19
175:23	sufficiently	summary	
199:18	37:1	17:24 41:7	survivors
203:1	139:23	115:17	14:13,16
206:20	suggesting	231:24	15:14
212:2	21:12 22:2	super 153:8,	suspect
218:14	suggests	9 155:23	144:3
229:2	126:23	156:2,7,	183:14
style 178:23	suicide	11,15,22	suspected
sub-opinions	177:9	157:6	101:4
33:3 36:5	suit 25:6	170:14	104:17
subcontractors	Suites 4:23	supplement	suspicion
193:21	5:18 7:24	42:11 43:3	36:22
subject	8:1,7	supplemented	183:14
40:11	34:17 35:7	42:6	suspicious
97:12	40:14	support	169:2
			180:18,24

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: swear..technologies**

181:18	tail	76:21 ,	talked	60:23	193:9
182:18 , 25		22		77:18	201:17
183:8 , 19 ,		takeaways		121:5	202:1
25 189:4		230:9		123:10	214:7 , 11
197:7 , 22				185:25	
203:13		takes	78:16	189:3	talks 86:16
swear 4:11		taking		205:25	90:16
5:2				211:19	119:17
				159:12	124:1
swing				228:5 , 8 , 25	130:10
195:11 , 20		talk	11:9	232:15	136:18
				32:18	139:22
sworn 5:8				70:20	151:24
synthesis				72:16	49:24
115:17				88:12	155:13
system 82:2 ,				89:24	62:25
3 , 17 , 22 , 23				94:19	162:15
148:6				114:21	67:13
195:16				132:22	179:7
196:3				136:24	82:16
				137:3	193:6
systematic				138:10	88:5 , 6 , 11
114:22				140:15	99:25 92:5
115:15 , 16 ,				155:24 , 25	tangible
20 , 21				156:1	187:8
116:25				160:21	103:10 , 11
124:16				165:2	target
133:18				173:2	140:11
				175:17	150:18
T				180:13 , 17	105:7 , 10 ,
				184:13	18:118:15 ,
table 40:5 ,				185:17	21:130:12
25 127:21				186:23	132:15
Tahir 29:25				188:10 , 11	15:24
30:3 32:12				189:21	taxing 24:14
35:6 , 13				194:16	TCOLE 13:9
70:22				216:5	Teams 78:10
77:23				219:14	158:6
171:16				226:2	170:15
					171:11 , 13 ,
					technological
					16 172:1
					96:7
					technologies
					181:2
					185:1 , 8

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: technology..things**

95:19	131:1	172:4	151:9,10,
technology	145:25	176:24	12,24
96:9 137:6	197:5	179:2,10,	153:2,8
	209:17	18,21	155:11,12
technology-wise 109:24	226:1	182:14	thing 27:1
		184:10	42:19 46:2
telephone	terrorism	186:14	48:16
67:11	121:23	193:14	49:10 55:2
195:16	test 19:10, 11 24:20, 22 119:23	194:22 213:21 218:11,21,	71:17 73:5,21 75:11 76:8
telling	tested 24:16	24 222:6 226:17,19	77:1 82:17
51:15 67:5	testified	227:23	100:1
135:24	5:9 85:10	232:18	101:14
tells 175:19			109:18
	testing		113:14
temperate	testifies	119:14	129:2
177:23	193:16	Texas 13:8, 10 15:21	133:9 134:25
temporal	testify	17:4 57:5	135:6
199:10,12	22:20 23:8	111:4	136:22
ten 215:1	140:11	151:17	164:22
tenant 155:9	146:7		175:13
tens 105:8	193:11	text 81:8, 12 92:12,	181:10
106:23	testifying	20,22	193:19
tense 46:18	145:9	93:7,11	200:6
term 52:5	testimony	100:20	201:17
81:18	5:2 7:15	theft 59:10	204:18
129:21	9:10,13	thefts 66:2	206:18
181:4	52:7 57:19	175:22	208:2
215:13	80:17,20	theoretically	217:10
	84:11	109:15	233:17
terminology	105:13		things
144:16	142:21		25:10,20
terms 14:21, 22 19:17	145:12,16	theories	26:25 51:2
53:13 63:8	146:10,20	151:10	59:11
	171:8	theory	75:19 76:4

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: thinking..today

81:2,19,22	thoughtful	202:13	198:21
100:2	138:6	time 4:6	199:3
108:9	thousand	8:19 15:5,	200:18
109:23	106:22	9 17:20	201:16
110:2	225:7	25:5 30:4	203:24
115:23		31:22	206:14
117:20	thousands	44:19 61:7	207:5
118:1	105:8	67:6 70:4,	217:6
129:25	106:23	5,8 71:4,	222:15
130:17,18,	threat 45:5,	25 72:13	225:11,14
24 134:10	18,20	77:10	226:1
137:25	46:2,4,24	78:12	227:13,16
154:5	47:9	79:22,23	228:16
163:3,4,7	135:21,22	80:1,4,8,	231:7,12
181:11	177:21,25	22 82:12	232:3
186:21	213:25	83:4,8,17,	235:11,18
195:13	214:4,8,11	23 85:6,	times 6:13
196:9,14	215:8	12,17,20	13:23 18:1
200:15	224:13,15,	101:17	19:22 30:2
201:13	21 225:3	103:21,25	80:11 82:1
205:9	threats	104:4	137:8,12,
208:3	43:21,23	120:21	14,17
212:6	46:13,18	121:1	171:10
222:25	47:17,20,	126:1	172:4
thinking	25 50:18	135:25	194:25
14:23	177:15	136:14	198:24
45:11 68:6	215:6	139:2	219:19
99:23		145:8	220:2
159:18,20	threshold	146:14	title 61:17,
	95:22	152:24	18
thoroughfare	198:10	155:17	
125:5,19	throwing	160:10	today 5:22
thought	113:14	166:23	7:23 8:4
119:18	thwart 48:7	173:3,4,7,	9:9,13
166:8		22,25	24:8 25:8
171:4	thwarted	183:7	42:10
176:5	230:15	192:7,11	71:23 73:5
204:12	ties 82:11	195:8	95:19

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: Today's..trafficking**

96:17,19	115:15	72:25	23 49:5,7
109:23	162:4	118:18	50:10,15,
137:7	165:5,25	125:8	20 51:4,20
152:6	171:23	127:5	52:11,20
180:4	180:1	194:19	54:19
209:11	184:3	195:13	55:6,8,17,
225:19	188:11	205:19	20 56:2
226:24	topic 115:18	trafficked	59:15
231:23	123:17	27:17	66:13,23
232:2,10	185:8	28:10,20	86:17
Today's 4:5	191:24	29:11	87:10,11,
told 35:13	topics	33:15	13,19,23
56:17	120:22	143:20	88:6,7,8,
60:17,18	204:2	trafficker	9,10,11,13
72:19	total 62:19	108:7	89:2,9,15
75:20 76:2	106:21	113:7	90:5,16,23
77:6 79:7,	219:19	130:23	91:1,3,16
8 80:12	totality	traffickers	93:18 95:8
84:6,7,11	74:3 215:7	29:6,10,15	99:4
89:7		92:13	102:8,13,
123:21	totally	126:12	21 103:3,
136:11	195:21	139:23	8,20
147:21,24	touched 78:2	143:24	104:19,23
193:17	tour 82:3	144:14	105:4,10,
196:9	tourism	157:1,22,	14,19,24
204:10	185:20	23	106:24
215:20	town 17:10	trafficking	107:7,14,
219:3	track 82:21	14:13,15,	22 108:15,
tone 128:19	tracking	19 15:2,6,	23 109:4
tool 133:10	82:20,25	13,19	110:8,12,
tools	83:1	16:1,13	22 111:5
124:11,15,	trade 11:23	18:11,14,	112:2,10,
17 130:5	12:11	16 33:24	25 113:7
133:17,19	traffic	34:2,12	116:4
top 22:18,		39:13,16	119:19
19 49:11		42:23	121:2
		43:12,17,	122:2,8,15
			123:2,12

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 Index: trafficking-related..truckers

124:3,5,23	20,25	230:23	36:8,15,
126:24	221:5,18	transferred	18,24
127:6,18,	222:2,4,7	74:20	54:10 79:6
19 129:21	228:24		140:12
130:16		transient	142:21
131:2,4,9,	trafficking-	87:24	145:16,19
10,23	related	90:16	146:8,10,
132:1,6,		91:17	15,20,24
16,18,19	train	135:15	147:1
134:16,21,		172:20	179:2,11,
23 135:2,	trained	13:8	18,21
13 136:4,		148:10	184:10
19 137:3		204:3	193:11,13
140:24	training		
141:4,6,9			
147:14	13:3,5,11,	trees	220:20,22
148:8,11,	12 26:23		234:17,19
22 149:4	122:13,19,	trend	
156:6	22 123:1,8	199:24,25	trials 22:21
159:16	189:11,18,	201:1,2	115:12,20
162:20	24 190:4,		116:1
172:20	6,21,22,24	trends	117:1
174:21	191:8	199:10,11,	220:14
175:2,7,	197:19	13 200:5,7	
10,12,18,	203:23,25	trespass	triangle
20 176:9,	208:23	100:2	150:18,19,
21 177:21,	217:19,21	188:22	20 151:2
24 178:13	228:9	189:5	152:5,7,8,
185:22	229:6,16	trespassed	9,10
189:15	trainings	205:21	153:3,4,6
190:19,23	13:13		155:19,22,
191:7,17,	69:14,17	trespassing	23 157:10,
24 192:14	185:20	99:21	13 163:1
204:2,6,8	189:14	tri-	trip 30:24
214:13	228:22	150:15	77:12
217:16,20	trains	trial 32:4,	truck 125:7,
218:17,19	122:7	12,25	18
220:18,19,	transcript	33:14,19	truckers
		34:1,10	125:6,19
		35:4,20	
	223:13		

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: true..understanding**

true	25:8	18:14	48:1	ultimately	5:16,19
	145:9	52:15	54:2	15:23	16:5
	184:21	88:5		21:19	16:17
	223:3,17	typical	8:13	25:15	44:6
				45:1	46:11
trusting		81:2		24:23	
	8:15	116:18		48:9	52:1
		142:15		62:7,11	29:24
trustworthy		175:14		74:20	35:10
	9:13	176:16		93:24	37:5
truth	5:3,4	181:6		114:25	47:11,18
turned	62:11	195:11,20		130:3	49:24
turns	119:18	199:11		155:18	52:7
	164:13	typically		158:23	54:15
TV	164:6	73:7	77:9,	166:21	56:11
		10	81:22,	195:4	61:5
TVPRA	15:4	24	82:4	201:25	63:4
	53:3	86:1	87:23	205:7	64:25
	175:19	90:12		umbrella	79:1
two-column		100:3		111:1	91:9
	206:19	115:18			97:25
two-factor		117:5			98:13,16
	193:6	137:10,15			110:20
	204:11	139:3			112:24
		140:7			122:10
two-minute		142:15			131:24
	101:24	152:20			136:21
two-step		157:6			146:19
	194:9	161:5		unaccompanied	150:25
		182:3		102:24,25	156:18
type	18:4			unaware	162:5
	52:18	86:2	—————	113:18	165:25
	168:6,7,8		U	113:16	166:13
	179:9	u.s.	150:13	178:16	171:14
	181:10			209:25	215:21,22,
	199:14	ubiquitous		218:15	23,25
	203:6	95:15			222:24
types	14:3	UCR	140:7	undergrad	223:12
				13:6	226:16
				22:12	230:6,14
					231:3,22
				underreported	understanding
				105:24	8:4
					53:1
				understand	54:12

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: understood..urine**

57:25	95:21,24	94:14,19	units	76:14
60:12,16	96:13	97:6,16	university	
63:14	101:13	99:4 108:1		151:17
71:14 78:3	198:10	129:19		197:4
79:18 81:7	unit 174:23	138:15	unlike	90:20
83:7,20	175:6	139:10		129:17
84:3 91:7		141:1,9,10		
96:17	United 4:18,	143:14	unlock	94:5
99:11	23 5:18	144:1,8,	unlocks	94:2
128:8	7:24,25	19,22		
131:18	8:1,5,7	145:3,24,	unpaid	10:15
139:20	27:17,22	25 146:8,	unreasonable	
146:23	28:10,20,	9,21		233:11,13
156:19	24 29:11,	148:22	unreliable	
162:7	16 30:5,	154:20,23		119:9,10,
184:15	10,12,14,	156:21		12,13
220:2	16 31:1,16	157:20	unusable	
224:20	33:16,21	158:12		168:11
228:17	34:3,11,17	159:2,3,6		
	35:7,20	160:25	unusual	
understood	37:2 40:13	162:2,3,8		181:5,9,
95:10	57:22 58:8	171:1		10,13,15,
112:23	62:16	172:3,10,		24 182:2,
123:5	64:14	19 176:11,		3,8,15,19,
125:14	69:19	25 178:19		25 183:21
167:5	70:13	179:3,8,16	up-to-date	
213:21	74:23	180:23		38:12
218:20	75:17	183:18	updated	
unequivocally	77:19,24	185:11		
147:24	78:9	187:10,25		42:10
uniform	79:11,19,	188:16		206:12
17:15	24 80:1,4,	193:12		223:24
105:6	22 82:13,	194:22		224:2,4
140:8	22 83:2,4,	196:2	upgrades	
148:5	5,8,9,18,	206:6		73:4,7
149:19	25 85:6,	217:3	upset	204:16
unique 45:7,	12,17,20	225:24	urine	112:13
18,19	91:6	231:20		

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: USA..violations

113:10	41:8 , 18	127:18	victims
USA 31:11	43:7 52:8	206:7	14:13 , 16
utter 168:10	54:11	207:2	15:6 , 14 , 19
	57:10 58:4	versus 4:4	33:24
	64:24	106:22	34:12 55:8
v	66:18	132:2	56:2 88:15
vague 144:16	70:11	220:3	90:21
	79:17 86:6		107:23
vaguely	90:15	vice 15:2	108:4 , 19 ,
172:6	92:19	48:1 49:5 ,	23 109:4 ,
validate	93:17	7 59:17	14 111:19
208:2	96:22	171:13	112:2 , 25
	104:7	vicinity	124:13
validates	106:10	143:24	126:24
208:21	116:17	144:15	129:20
varied 17:20	117:13	vicious	131:8 , 23
	127:4	169:8	132:1
varying	135:12		149:10
203:16	144:19	victim 14:19	151:4
Vegas 168:9	146:7	15:25 16:4	158:2
vehicle	169:24	87:15	203:14
194:16 , 18	174:3	108:7	
195:9	179:24	113:7	video 49:21 ,
vehicles	218:7	124:14	22 78:10
51:18 66:2	226:14 , 19	129:11 , 12	115:23
199:20	227:19	130:16 , 20 ,	142:11 , 18
	232:2 , 9	24 131:1 ,	143:2 , 13
Vellani 4:3 ,	233:20	3 , 6 132:17	182:8
25 5:7 , 12	235:1 , 11	150:18	196:2 , 10
7:23 8:10 ,		152:12 , 16	205:13 , 15
19 9:8 , 16	vendors	153:11	videos 75:1 ,
18:19 23:3	209:10	217:16	3 , 6 142:25
25:10	verb 46:18		143:13
28:21	verbal 112:3	victimization	196:12
31:24 34:2		112:3	
36:2 , 25	verifying	113:1	violation
37:7 38:8	208:25		215:16
39:25	version	victimized	
		153:16	violations
			69:20

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: violence..weeks

184:14	volition	219:14	49:20
violence	204:7	walk-through	Warren
121:2	volume	157:17	201:14,23
164:3,8	171:17	walked 71:6	watch 141:25
203:14	vouch 35:12	76:24,25	153:15
violent	Vuitton	181:7	164:5
175:8,15	153:20	205:4	watched
176:17	vulnerabilitie	219:2	141:23
184:19,22	s 43:18,22,	walking	ways 8:3
201:24	24 45:18	47:12	90:4
219:14	46:14,19	99:17	100:15,16
virtually	47:18,21	200:2	weaker 25:1
140:2	48:5,12	walks 94:2	weaknesses
166:10	215:21	wallet	46:14
virtue 33:25	vulnerability	152:15	215:25
163:9,14	45:7,21	Walmart	weapons
178:14	46:8 47:5	17:10	178:6
visibility	57:8	wanted 30:9	181:8
76:12	214:1,5	32:20	wearing
96:12	215:17	37:18 44:6	153:14
visible	216:2,7	58:2 70:11	Weber 68:18
187:8	vulnerable	72:15	185:17
visit 30:14	107:11,12	104:15	189:2
77:18	W	138:7,12	
visited 30:5	Wade 97:8	160:18	website 85:3
77:19	wait 8:20	165:4	websites
visiting	164:7	167:5,12	31:5,8,17
171:9	165:24	187:20	85:18
visitor	waiver	189:12	
202:24	231:17	226:3,11	week 61:13,
visits 74:14	walk 77:2	231:20,21	19 171:10
171:18	89:8	warrant	172:4
volatile	214:3,4	196:11	weeks 77:13
164:9		205:11,12	103:1,13
		warrants	141:14

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023 **Index: whatsoever..wrote**

whatsoever	worded	33:22	worked	10:20	117:24
20:16	wording		11:4 12:25		118:2
widely	133:6		14:1,12,15		138:3
207:15			16:13,17		201:17,22
212:16,18	words	24:20	56:9,11,	world	19:5
228:21	50:18	53:20 79:5	18,23		215:7
Wilberforce	88:16		62:25		
15:4 53:3	132:14		63:23 64:6	worse	148:1
175:19	153:12		66:25		208:7
192:2	157:20		69:11	write	121:10
	159:15		82:15		201:21
William	163:5,24		working	writers	
192:2	167:4		14:1,25		99:25
win	208:5,9		17:1 22:10	writes	
window	210:19		44:22,24		166:17
76:6, 19 187:1	213:1		49:16,19		
windows	216:20		52:23	writing	
45:15	232:20		53:12 60:5		48:22
153:19	work	10:13	61:6,13,18	written	21:6
190:2	16:20 18:2		62:11		22:14 56:6
Wings	48:7 50:7, 12,22,23		64:22		57:1 58:22
withheld	58:10 65:7		65:11,13, 22 66:7,10		81:25 82:8
58:1	96:16,18,		67:17		166:23,24
witnesses	19 114:25		83:5,9,11		183:23
116:19	117:20,22		122:3		184:15
184:11	118:1,4		189:24		203:20
210:4	172:14		220:1		231:11
211:12	187:24		worklife	wrong	64:12
woman	191:13,19, 22,23		208:24		78:3 118:8
70:12			workplace		130:1
wonderful	208:9,11, 141:5		121:2	wrote	176:4
	12 209:12				49:1
word	224:14,18, 87:2,21		works	166:20	
34:6	20 225:4, 131:20		25:19		206:14
	15,21,22		49:14		
	163:13		64:25 65:3		
			99:1		
			115:1,5		

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.

Karim Vellani on 11/28/2023

Index: yahooos..zoom

yesterday	
Y	
	206:5
	217:2
yahooos	116:2
	222:17
	119:20
	223:20
	133:24
	233:20
year	19:9
	234:15
	53:5,13,15
	235:2
	63:17,19
	York 99:24
	103:14
	184:17,20
	105:15
	young 70:12
	139:18
	171:2
	173:15
	Z
years	16:18
	18:8 19:12
	27:12,16
	30:17
	148:21
	31:22
	zaccheus
	47:24
	25:3
	49:18,25
	78:10
	50:14
	115:2
	52:22
	53:4,6,7,
	9,16,17
	54:24 60:2
	63:21
	67:15
	73:3,6
	134:15
	139:16,18
	147:25
	161:9
	173:9,10,
	13,14,19
	176:25
	186:9,13
	191:20
	192:18